

LOCAL 5000 MacTnL
Williamsburg, VA
CLERK OF DISTRICT COURT
WILLIAMSBURG, VIRGINIA

for the

Case No. 3:20 cv 753
Jury Trial: Yes

Plaintiff (s)

- Deborah AL - Jarbova Mother
- Deborah AL - Jarbova Brother

1 -Wendy Evans Williamsburg department of Human services
2 - United States Army Fort Bragg- NORMANDY DR. NORTH CAROLINA
3 28310-0000

4 All Responsible Parties Jointly, Individually, In official
5 capacity, Et, Al

6 I preserve my rights to add parties as they are discovered
7 Defendant(s)

8 **COMPLAINT FOR A CIVIL CASE**

9 Supreme Court found that pro se pleadings should be held to "less
10 stringent standards" than those drafted by attorneys. pro se
11 litigants' pleadings are not to be held to the same high
12 standards of perfection as lawyers. Maty v. Grasselli Chemical
13 Co., 303 U.S. 197 (1938) "Pleadings are intended to serve as a
14 means of arriving at fair and just settlements of controversies
15 between litigants. "Pleadings in this case are being filed by a
16 Plaintiff in Propria Persona, wherein pleadings are to be
17 considered without regard to technicalities. Propria, pleadings
18 are not to be held to the same high standards of perfection as
19 practicing lawyers. See Haines v. Kerner 92 Sct 594, also See
20 Power 914 F2d 1459 (11thCir1990), also See Hulsey v. Ownes 63 F3d
21 354 (5th Cir 1995). also See In Re: HALL v. BELLMON 935 F.2d 1106
22 (10th Cir. 1991)."

23 **I. The Parties to This Complaint**

24 **A. The Plaintiff(s)**

25 1.

26 Name: Estate of Jerry Theodore McCallup Jr
27 Street Address: 1042 North Mountain Ave
28 City and County: Upland, CA 91786
State and Zip Code: California 91786
Telephone Number: 504-405-6513
E-mail Address: vmccallup@yahoo.com

29 2.

30 Name: Dr. Veronica McCallup DSc Executor/Administrator
31 Street Address: 1042 North Mountain Ave
32 City and County: Upland, CA 91786
33 State and Zip Code: California 91786
34 Telephone Number: 504-405-6513
35 E-mail Address: vmccallup@yahoo.com

36 3.

37 CTI, Inc/ CTI chemicals and Allied Products, Inc
38 Street Address: 1042 North Mountain Ave
City and County: Upland, CA 91786

1 State and Zip Code: California 91786
2 Telephone Number: 504-405-6513
3 E-mail Address: vmccallup@yahoo.com

4 **B. The Defendant(s)**

5 Provide the information below for each defendant named in the
6 complaint, whether the defendant is an individual, a government
7 agency, an organization, or a corporation. For an individual
8 defendant, include the person's job or title (*if known*). Attach
9 additional pages if needed.

10 4. Envoy of Williamsburg

11 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

12 5. Sentara Health Care

13 6015 Poplar Hall Dr, Norfolk, VA 23502

14 6. City of Williamsburg

15 Department of Human Services social services Division

16 401 Lafayette Street, Williamsburg, VA 23185-3617

17 7. Brian L. Stevenson Jr

18 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

19 8. Scarlett Huang (compliance officer)

20 1235 S. Mount Vernon Ave, Williamsburg, VA 23185 757-229-4121

21 9. The State of Virginia Attorney General - Mark R. Herring

22 202 North Ninth st, Richmond, VA 23219

23 10. County Attorney for Williamsburg and James City County

24 -Adam Kinsman

25 101 Mounts bay Rd building D, Williamsburg, VA 23185 757-253-6612

26 11. County of James city county

27 Commonwealth Attorney and Board of Supervisors

28 101 Mounts bay Rd building D, Williamsburg, VA 23185 757-253-6612

12. Consulate Health Care

800 Concourse Parkway, Maitland, FL 32751

13. Ciera

1235 S. Mount Vernon Ave

1 Williamsburg, VA 23185
2 14. Britany Moore
3 Department of Human Services social services Division
4 401 Lafayette Street,
5 Williamsburg, VA 23185-3617
6 15. Envoy affiliate corporations
7 16. Deborah Shelton Al-Jarboua c/o Britany Moore
8 Department of Human Services social services Division
9 401 Lafayette Street,
10 Williamsburg, VA 23185-3617 LKA OCALA, FLORIDA
11 17. Jeremy McCallup c/o Britany Moore
12 Department of Human Services social services Division
13 401 Lafayette Street,
14 Williamsburg, VA 23185-3617
15 18. Fahad Al-Jarboua c/o Britany Moore
16 Department of Human Services social services Division
17 401 Lafayette Street,
18 Williamsburg, VA 23185-3617
19 19. Jerry Theo McCallup III c/o Britany Moore
20 Department of Human Services social services Division
21 401 Lafayette Street,
22 Williamsburg, VA 23185-3617 LKA COLORADO SPRINGS, CO
23 20. Judge Williamsburg 5201 Monticello Ave Williamsburg, VA 23188
24 21. United States Army Fort Bragg- NORMANDY DR. NORTH CAROLINA
25 28310-0000
26 22. The doctors in charge of care and doctors who cared for Mr.
27 Jerry Theodore McCallup Jr.
28 23. Police that took Mr. Jerry Theodore McCallup From his home.
425 Armistead Ave. Williamsburg, VA 23185. Phone: (757) 220-2331.

1 24. Sheriffs James City County Government Center 101 Mounts Bay
2 Road Williamsburg, VA 23185

3 25. williamsburg Human services 401 Lafayette St Williamsburg VA
4 23185-3617

5 26. Wendy Evans 401 Lafayette St Williamsburg, VA 23185-3617

6 27. Any and all insurance policies of plaintiff Jerry Theodore
7 McCallup Jr

8 28. Plaintiff reserve the right to add unknown parties

9 29. Jeremy McCallup's Wife

10 COMPLAINT FOR CIVIL CASE

11
12 **COMES NOW**, The ESTATE OF JERRY THEODORE MCCALLUP JR, by and
13 through Administrator, Power of Attorney, Medical Power of
14 Attorney, Beneficiary, IN PRO PER, and brings the following
15 action against defendants individually and jointly and in
16 official Capacities and seeks answers and accountability and
allege as follows:

17 I. That the State of Virginia with its corporations,
18 employees, doctors, hospitals and agents; had to give the
19 entire family, business liaison, and x-wives of Plaintiff
20 Jerry Theodore McCallup JR notice prior to any and all
21 court hearings, prior to any court actions,
22 hospitalizations, adult protective service action, because
23 they may have interest.

24 II. That Jerry Theodore McCallup Jr has always been a healthy man
25 from a healthy athletic family and retired from the U.S. Military
26 after 24-25 years on a regular retirement. He continued working
27 as a civilian after the military retirement, until another
28 retirement. He was an avid golfer and golf often. He even bought
a home between two (2) golf courses. The McCallup's Great grand
Father owned a Golf course in Arkansas.

1 III. Jerry Theodore McCallup Jr and sister started a business in
2 1985 in Detroit Michigan called CTI, Inc and incorporated the
3 business in Illinois as CTI Chemicals and Allied Products, Inc.
4 until present and thereby, plaintiff asserts that the plaintiffs
5 has alleged loss of support in this complaint, and can recover
6 damages because the individuals named as the representatives of
7 the estates can show reasonable expectation of receiving support
8 from the decedents.

9 IV. Jerry Theodore McCallup Jr, was a resident of several states
10 because of the military and business involvement. Jerry Theodore
11 McCallup Jr was raised in Detroit, Michigan. On or about 2010
12 Jerry Theodore McCallup Jr; witnessed by several attorneys and
13 notary, made his sister Dr. Veronica Renee McCallup DSC, his
14 Power of Attorney and His Medical Power of Attorney. In 1967
15 Jerry Theodore McCallup Jr made Dr. Veronica McCallup DSc his
16 Beneficiary and never changed it even after two (2) failed
17 marriages; Dr. Veronica Renee McCallup DSc remained his
18 Beneficiary on all his military records and property and assets.
19 Dr. Veronica Renee McCallup DSC name is also on Jerry Theodore
20 McCallup Jr Savings Bonds for over fifty (50) years. Jerry
21 Theodore McCallup Jr and Dr. Veronica Renee McCallup DSC had
22 remained close and business partners all their lives.

23 V. Dr. Veronica Renee McCallup DSC has went to several
24 Universities and Married and raised family and lived in states
25 with Jerry Theodore McCallup Jr and in states without Jerry
26 Theodore McCallup Jr. Mr. Jerry Theodore McCallup Jr and Dr.
27 Veronica Renee McCallup DSc grew up in the same humble home and
28 slept in the same bed. She slept on his head.

VI. Plaintiffs believe that during between 2018-2019 Mr. Jerry
Theodore McCallup Jr. continually requested and demanded the
presence of Dr. Veronica Renee McCallup DSc while hospitalized
and during court proceedings and until death. But defendants

1 refused his rights/ and his last rights, and blocked the presence
2 of Dr. Veronica Renee McCallup DSc, so, that defendants could
3 obtain property and moneys (as they did at plaintiffs fathers
4 death, where Dr. Veronica McCallup DSc was also father's
5 beneficiary). Mr. Jerry Theodore McCallup Jr uncle was
6 Congressman John Conyers and if there was a court proceeding for
7 adult protective services, he would have contacted his sister;
8 Dr. Veronica Renee McCallup DSc, to contact counsel and or
9 Congress in 2018-2019.

10 VII. Plaintiff Jerry Theodore McCallup Jr asserts a fourth
11 amendment violation. Defendants couldn't begin legal proceeding
12 for protective services with fabricate evidence by non-family and
13 initiators. *Manuel v. City of Joliet, Ill.*, 137 S. Ct. 911, 915
14 (2017). Fabricated evidence was the only evidence the judge
15 relied on during the probable-cause hearing, that resulted in
16 Plaintiffs Jerry Theodore McCallup Jr, being placed into adult
17 protective service and the Judge failed to locate and identify
18 Dr. Veronica Renee McCallup DSc who would have taken plaintiff
19 Jerry Theodore McCallup Jr. out of/away from Virginia and to
20 California or Michigan. But defendants didn't want that. They
21 wanted the Plaintiff Jerry Theodore McCallup Jr where they could
22 find his money. The Supreme Court granted certiorari deciding
23 "whether an individual's Fourth Amendment right to be free from
24 unreasonable seizure continues beyond legal process so as to
25 allow a malicious prosecution claim based upon the Fourth
26 Amendment." *Id.* at 924 (J. Alito dissenting) and it did.
27 Defendants failed to give due process and notice to all Plaintiff
28 Jerry Theodore McCallup Jr Family members and determine what
options were available.

Justice Kagan's majority opinion answered affirmatively, over
Justice Alito's dissent. The majority has two parts. First, the

1 majority held, "if the complaint is that a form of legal process
2 resulted in pretrial detention unsupported by probable cause,
3 then the right allegedly infringed lies in the Fourth
4 Amendment." *Id.* at 919. The majority explained "legal process"
5 covers any proceeding, including grand-jury indictment or
6 preliminary examination, where the proceeding lacks probable
7 cause because it's tainted by fabricated evidence.

8 The majority stated, "the contours and prerequisites of a §1983
9 claim, including its rule of accrual, courts are to first look to
10 common law torts" leading to the adoption of "wholesale the rules
11 that would apply in a suit involving the most analogous tort."

12 VII. Plaintiffs are Native Indians and are federally protected
13 and entitled to Religious rights. The American Indian Religious
14 Freedom Act, Public Law No. 95-341, 92 Stat. 469, codified at 42
15 U.S.C. § 1996, is a United States federal law. Plaintiffs were
16 refused Religious rights, Religious diet, and sister to do
17 religious last rights of passage or any Native tribe in the
18 Virginia area. There are ten(10) Native tribes very close to
19 Williamsburg Virginia.

20 VIII. Plaintiff Jerry Theodore McCallup Jr could have went to
21 live with Dr. Veronica Renee McCallup DSC (in the pass they have
22 lived together many times. Jerry Theodore McCallup Jr has even
23 asked Dr. Veronica Renee McCallup DSC to allow his son Jerry
24 Theodore McCallup III to live with her and she opened her door to
25 this nephew). So caring for her only brother was normal. Treating
26 her only brother at other medical facilities outside of Virginia
27 was no problem. If Jerry Theodore McCallup Had a serious medical
28 issue, defendants could have stabilized Jerry Theodore McCallup
Jr and our cousin Jerome Morgan would have picked him up in a
plane and flew him HOME or Dr. Veronica McCallup DSc could have
had him air lift to a better medical facility within 1-2 (2018-

1 2019) years. Dr. McCallup DSC has friends with planes that would
2 have flew him HOME at anytime. Dr. Veronica McCallup DSC or the
3 Chief of Staff at Detroit Medical Center, Dr. Michael Wood MD,
4 would have and could have personally came or helicopter Mr. Jerry
5 Theodore McCallup Jr in, from any where, from Virginia to
6 Michigan to Chicago to California; for medical care and better
7 medical care with in one-two years.

8 IX. In This lawsuit discovery , facts are unravels like the
9 Novel/Movie "MISERY". During a blizzard, Paul crashes his car
10 (Plaintiff Jerry McCallup Jr will not allow defendant Jeremy
11 McCallup to have his house) and is met by a cheerful loner named
12 Annie Wilkes (Kathy Bates), (Defendants) who calls herself his
13 "biggest fan" and sets about nursing him back to health. However,
14 things take a turn once Annie discovers that Paul has killed off
15 his character(plaintiff Jerry Theodore McCallup JR wanted to move
16 back to illinois) Misery – and Paul (Plaintiff Jerry Theodore
17 McCallup JR) discovers, in turn, that his caretaker (defendants)
18 has a very dark past. Annie holds Paul hostage in her isolated
19 home, forcing him to (take drugs/poisons to native Americans)
20 write a new novel in which the heroine survives (causing
21 Plaintiff to remain in virginia incapacitated). The iconic ankle-
22 smashing scene arrives when Annie realizes that Paul is plotting
23 an escape. After drugging him and strapping him to his bed, she
24 calmly tells Paul about the practice of "hobbling," once used in
25 African diamond mines on workers who tried to run off with the
26 goods. As Paul begs for mercy, she wedges a piece of wood between
27 his legs and picks up a sledgehammer, assuring Paul, "It's for
28 the best." Then she brings down the hammer and breaks his ankles
in two swift strokes. "God, I love you," she purrs as he writhes
in agony.

1 X. Plaintiffs have learned that defendants Envoy of Williamsburg
2 was in serious major medical violations and state violations and
3 federal violations in 2018 - 2019. However, after being cited, no
4 agency returned to recheck the violations prior to Jerry Theodore
5 McCallup Jr wrongful death. Plaintiffs also learned that another
6 person at the same facility died in the same month of Jerry
Theodore McCallup Jr death.

7 XI. Plaintiff Jerry Theodore McCallup Jr is Native American and
8 NOT an alcoholic and DOES NOT use medications. Defendant Deborah
9 Al-Jarboua advised, suggested, prescribed, led others defendants
10 to believe that Plaintiff Jerry Theodore McCallup Jr should be
11 mal-treated and doped up. Plaintiff Jerry Theodore McCallup Jr
12 didn't want that woman around him. Jerry Theodore McCallup Jr
13 told Dr. Veronica Renee McCallup DSc, that defendant Deborah Al-
14 Jarboua had put something in his food. Dr. Veronica Renee
15 McCallup DSc began sending Jerry Theodore McCallup Jr. Native
American treatments to cleans his system and blood and urine.

16 XII. Defendant Deborah Al-Jarboua became infuriated; when Jerry
17 Theodore McCallup Jr didn't want her around and she caused the
18 protective order to be instituted by and through defendants:
19 Jeremy McCallup, Fahad Al-Jarboua and Britany Moore of the
20 Williamsburg department of Human social services.

21 XIII. Plaintiff Dr. Veronica McCallup DSC was never contacted nor
22 told of these actions. Dr. Veronica McCallup DSc wasn't told of
23 her brothers' Death nor of the cremation to hide the poisons
24 defendant Deborah Al-jarboau and defendant Envoy of Williamsburg
25 doctors forced upon Jerry Theodore McCallup Jr. by and though
26 Williamsburg department of social services and williamsburg
police.

27 XIV. When Plaintiff Dr. Veronica McCallup DSc found out about
28 Jerry Theodore MCCallup Jr death; it was on social media and
texted to other people. Plaintiff Dr. Veronica McCallup DSc did

1 obtain some medical files that has conversations between
2 defendants Deborah Al-Jarboua (and thereby, Fahad Al-jarboau) and
3 Defendant Britany Moore (and defendant "Evans) of the county of
4 James City and city Williamsburg. Defendants Deborah Al-Jarboua
5 and defendant Britany Moore used the defendants Williamsburg
6 police and Williamsburg sheriffs to force medications into
7 plaintiff Jerry McCallup Jr.

8 XIII. Plaintiff Jerry Theodore McCallup Jr. was forced medicines
9 but was able to make it home the first time.

10 XIV. Defendants came after him again to force him into Envoy of
11 Williamsburg while they were in violation of Federal and State
12 codes ordinances rules laws. After Plaintiff was kidnapped again
13 and forced medication and other things and he told them
14 (defendants: Jeremy McCallup, Britany Moore, "Evans", city of
15 Williamsburg, James city, james city county, Fahad Al-Jarboua and
16 Deborah Al-jarboua) that he wasn't taking ANY PHARMACEUTICALS.
17 But they needed him dead. The goal was his death. They never
18 located Plaintiff Dr. Veronica Mccallup DSC to see if she could
19 make him take drugs/pharmaceutical or even to talk to Jerry
20 Theodore McCallup Jr about his health if they were really
21 concerned.

22 XV. The defendant Envoy of Williamsburg told plaintiff Dr.
23 Veronica Renee McCallup DSc that "they" (defendants Fahad Al-
24 Jarboua and Jeremy McCallup) was trying to get him to tell them
25 where his money was. Defendants at Envoy of Williamsburg told
26 plaintiff Dr. Veronica McCallup DSc on the phone, That; they knew
27 he had more money and that even Envoy of williamsburg knew, he
28 had other money; but none of the defendants were able to locate
the money nor the insurance policies and bank accounts. Plaintiff
Jerry Theodore McCallup Jr. had a vehicle that somebody has and
Plaintiff Dr. Veronica Renee McCallup DSc stop payments on it.

XVI. Plaintiff Dr. Veronica Renee McCallup DSc attempted to reach

1 Fahad Al-Jarboua an army recruiter out of Fort Bragg N. Carolina
2 by contacting military records in St. Louis who located defendant
3 Fahad Al-Jarboua and gave him Plaintiffs Dr. Veronica Renee
4 McCallup DSc phone number. Plaintiff Dr. Veronica Renee McCallup
5 left the message that; "I just found out my brother has died I'm
6 trying to obtain information about what happened". Defendant
7 Fahad Al-Jarboua called plaintiff Dr. Veronica Renee McCallup DSC
8 and said "you have the wrong number". The military, fort braggs
9 located him, Plaintiff didn't. He was going to Defendant Envoy of
10 Williamsburg pretending to be Jerry Theodore McCallup Jr son
11 (Jerry the III) "in uniform" and thereby obtaining HIPPA PHI
12 documents and information and passing that information to
13 defendant Deborah Al-jarboua via phone text social media.
14 XVII. Defendants, Envoy of williamsburg told Plaintiff Dr.
15 Veronica Renee McCallup DSc on the phone, that defendant Fahah
16 Al-jarboua was there, at defendants Envoy of Williamsburg,
17 overseeing Plaintiff's Jerry Theodore McCallup, medical care and
18 death with Envoy of Williamsburg treating doctors and medical
19 staff often, in uniform, trying to get Plaintiff Jerry Theodore
20 McCallup Jr to tell where the money was. Defendants never tried
21 to obtain better medical care for Jerry Theodore McCallup Jr.
22 They never tried to contact Dr. Veronica Renee McCallup Dsc in
23 California nor Congressman John Conyers in Washington D.C. nor
24 any Local Native Indian tribe. To locate the medicine man or the
25 chief to give last rights or care. Defendant Jeremy McCallup Has
26 "Native Indian", on his birth certificate and should know that
27 Jerry Theodore McCallup Jr doesn't take medicines and thereby,
28 defendants used the social services and cops to kill plaintiff
Jerry Theodore McCallup Jr willfully and wantonly, and
intentionally.

XVIII. Plaintiff tried to file a wrongful death civil action in
the Virginia state court and the Williamsburg judge rejected the

1 filings. The court wouldnot give the filing a case number. When
2 Plaintiff asked, why, the Williamsburg judge clerk would say she
3 didn't know. Plaintiff filed the case 4-5 times and the filing
4 was rejected 4-5 times.

5 XIX. Plaintiff owned a 3,500 square foot house in Williamsburg 20
6 years. Defendant Jeremy McCallup and Deborah Al-jarboua caused
7 the home to go into foreclosure and Plaintiff to become ill.
8 Plaintiff had an income of \$3,400.00-\$4,900.00 per month. The
9 defendant Jeremy (who may have an autism) moved plaintiff Jerry
10 Theodore McCallup Jr into motel 6 and sought to obtain \$1,500.00
11 per month from Plaintiff income. After being in Motel 6 a while,
12 Defendants Jeremy McCallup and Deborah Al-jarboua sought
13 Defendant Britany Moore and the Williamsburg human services to
14 place Plaintiff into Envoy of Williamsburg.

15 XX. Plaintiff intend to show that Jeremy McCallup and Deborah Al-
16 Jarboua and Fahad Al-Jarboua co-conspired to drug Plaintiff Jerry
17 Theodore McCallup Jr. until he was non-responsive and or
18 incapacitated. And may have started the drugging in 2014 And then
19 sought to obtain more money by obtaining human services via the
20 city of Williamsburg, James city county who in turn took the
21 opportunity to obtan money for it selves from the elder Jerry
22 Theodore McCallup JR and abused the elder and denied the elder
23 the best care and alternative care. Plaintiff intend to show that
24 Defendant Jeremy McCallup is incapable of handling a life and
25 that defendants knew it. That defendant Deborah Al-Jarboua and
26 Fahad Al-Jarboua are the brains behind any treatments and actions
27 to Plaintiff Jerry Theodore McCallup JR. They never located Jerry
28 Theodore McCallup JR older son Jerry III to determine if he was
fit or a candidate to monitor care. These are All
responsibilities of social service/Human services of Williamsburg
and wendy evans and britany moore. Jeremy McCallup is not
mentally stable, he has sometype of slowness and may have cause

1 plaintiff Sickness and onset of Illness by abuse. Plaintiffs are
2 in discovery.

3
4 **Basis for Jurisdiction**

- 5 • The defendant is from another state or another country,
Diversity of citizenship
6 • The defendant is a large corporation that is being accused of
violating certain federal laws, Federal question.
7 Under 28 U.S.C. § 1331, a case arising under the United States
8 Constitution or federal laws or treaties is a federal question
case.
9 Under 28 U.S.C. § 1332, a case in which a citizen of one State
sues a citizen of another State or nation and the amount at stake
10 is more than \$75,000 is a diversity of citizenship case.

11 **A. If the Basis for Jurisdiction Is a Federal Question**

12 List the specific federal statutes, federal treaties, and/or
provisions of the United States Constitution that fill out the
13 paragraphs in this section that apply to this case.

14 1. Wrongful death suit against a police officer for violating
loved one's civil rights.

15 2. Suing a larger corporation for violating specific federal
16 laws.

17 3. Suing a defendant from another state or another country.

18 4.42 U.S.C. 1983

19 5. VIOLATION OF FIRST AMENDMENT RIGHTS DENIED ACCESS TO THE COURT
20 BY VIRGINIA STATE COURT

21 6. Title 18, U.S.C., Section 242 - Deprivation of Rights Under
Color of Law

22 7. Title 18, U.S.C., Section 241 - Conspiracy against Rights

23 8. 18 USC 242: Deprivation of rights under color of law

24 9. HIPPA VIOLATIONS Impermissible disclosures of protected health
25 information (PHI)

26 10. Fourth Amendment Violation

27 11. RICO 18 U.S.C. 1962

1 12. Violation of ELDER ABUSE 42 U.S. Code § 3058i - Prevention of
2 elder abuse neglect, and exploitation

3 13. Jerry Theodore McCallup Jr should have been in a different
4 hospital and or medical facility. Jerry Theodore McCallup Jr has
5 a son Jerry Theodore McCallup III was was never contacted nor
6 give notice of any court proceeding, nor asked if he could be
7 responsible for his dads care in The State of Colorado. Jerry
8 Theodore McCallup Jr has a sister that's a doctor and she is not
9 asked if she could care for her brother before Jeremy Mccallup
10 and Deborah Al-Jarboua pulls the pulg on Mr. Jerry Theodore
11 McCallup Jr and kills him, per the human services records.

12 14. If Mr. Jerry Theodore McCallup Jr wasn't placed under
13 protective custody in the first place he would be alive. If
14 defendants had checked the identity of defendants they would have
15 determined they were not family. If defendants had properly
16 notified all family and bills debtors friends business for court
17 hearings, defendants would have learned that Plaintiff Dr.
18 Veronica McCallup DSc is Plaintiff Jerry Theodore McCallup JR.'s
19 power of Attorney and no action could be initiated without his
20 power of attorney. Im sure he requested "his sister".

21 15. Mr. Jerry Theodore McCallup Jr had properties in several
22 states and an income of \$3,900.00-\$4,900.00 per month. That
23 defendants took and caused the loss of his house and the loss of
24 his apartment and caused him to live in a motel 6. Defendants
25 were stealing his money and administering medications
26 contraindicating to Plaintiffs; diet, health and religious
27 beliefs.

28 16. The defendants ABUSED AN ELDER Jerry Theodore McCallup Jr

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1 **1. The Plaintiff(s)**

2 a. If the plaintiff is an individual
3 The plaintiff, Estate of Jerry Theodore McCallup Jr, is a citizen
4 of the State of New Mexico.

5 b. If the plaintiff is a corporation
6 The plaintiff, CTI Chemicals and Allied Products, Inc, is
7 incorporated under the laws of the State of ILLINIOS,
8 and has its principal place of business in the State of
9 California.

10 c. Dr. Veronica McCallup DSc 1042 N. Mountain Ave, Upland , CA
11 91786

12 **2. The Defendant(s)**

13 a. If the defendant is an individual
14 The defendant, Britany Moore, is a citizen of
15 the State of Virginia .

16 b. If the defendant is a corporation
17 The defendant, ENVOY of Williamsburg, is incorporated under
18 the laws of the State of FLORIDA , and has its
19 principal place of business in the State of FLORIDA .
20 Or is incorporated under the laws of Florida, New York,
21 and has its principal place of business in VIRGINIA,FLORIDA, NEW
22 YORK .

23 **3. The Amount in Controversy 80.1 Million dollars and burial
24 expenses and travel**

25 The amount in controversy-the amount the plaintiff claims the
26 defendant owes or the amount at stake-is more than \$75,000, not
27 counting interest and costs of court, because (explain):80.1
28 million dollars. See attached claims.

29 **III. Statement of Claim**

30 A. Write a short and plain statement of the claim. Do not make
31 legal arguments.

32 1. Virginia is NOT Plaintiff's Home.

33 2. Jeremy Mccallup, Deborah Al-Jarboua and Fahad Al-Jarboua are
34 NOT persons that can; initiate, control Plaintiff Jerry Theodore
35 McCallup Jr; money, decisions, property, legal actions, Health
36 care.

37 3. The incapacitation of Plaintiff Jerry Theodore McCallup Jr was
38 caused by poisons/drugs given to plaintiff Jerry Theodore
39 McCallup Jr. at his house/home prior to : Jeremy Mccallup,
40 Deborah Al-Jarboua and Fahad Al-Jarboua seeking the other
41 defendants involvements.

1 B. State as briefly as possible the facts showing that each
 2 plaintiff is entitled to the damages or other relief sought.
 3 Plaintiff Dr. Veronica McCallup DSc is the Estate administrator
 4 and Executor in 4 states and has accrued cost traveling, piecing
 5 the estate together. Dr Veronica Mccallup DSc was in a business
 6 partnership with Plaintiff Jerry Theodore McCallup Jr and his
 7 death cuts Half or more of the business ventures. He handled all
 8 the military ventures. The denial of rights to notice and burial
 9 and care and last rights and survivor rights allows Plaintiff Dr.
 10 Veronica McCallup DSc damages and benefits as stated in military
 11 records and insurances.

12 C. State how each defendant was involved and what each defendant
 13 did that caused the plaintiff harm or violated the plaintiff's
 14 rights, including the dates and places of that involvement or
 15 conduct.

16 If more than one claim is asserted, number each claim and write a
 17 short and plain statement of each claim in a separate paragraph.
 18 Attach additional pages if needed

19 **CLAIM I VIOLATION OF FIRST AMENDMENT RIGHTS DENIED ACCESS TO THE**
 20 **COURT BY VIRGINIA STATE COURT DEMAND \$3,000,000.00**

21 Defendants: Judge of Williamsburg, Brittany Moore, Deborah Al-
 22 Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua,
 23 Williamsburg Department of Human Services social services
 24 Division, Wendy Evans Williamsburg human services, County of
 25 James city county, Brain L. Stevenson Jr , State of Virginia

- 26 1. Plaintiffs reaffirm all said herein and state that: on or
 27 about 2018-2020 plaintiff attempted to file a civil law suit
 28 with the City of Williamsburg county of James City County
 and the courts refused plaintiff Dr. Veronica McCallup DSc
 access to the court by returning all civil claim documents
 petitions law suits cover letters and request.
2. Plaintiffs attempted to re-file the lawsuit modifying the
 claim and documents several times 4-5 times between 2019 and
 2020.
3. Plaintiff verbally ask the defendants City of Williamsburg
 James city county, "why will you NOT file my law suit?".
 "why you will not place a case number on the filing ?" The
 defendants City of Williamsburg James City county seem to be
 covering up something or preventing and record of the
 wrongful death lawsuit of plaintiff Jerry Theodore McCallup
 JR.

- 1 4. Plaintiff learned that there had been another wrongful death
2 civil lawsuit filed against the same defendants 2019 and
3 that case seem to have disappeared from the court dockets.
4 There was the filing then no action, no motions, no
5 settlements, no negotiations no court dates for over 6
6 month.
- 5 5. Plaintiff also learned that the defendants city of
6 Williamsburg James city county Judge of Williamsburg has one
7 Judge that does what he wants to do and was also the Judge
8 that violated Plaintiff first, fourth and fourteenth
9 amendment right of access to the court and due process right
10 of notice and right to appear and be heard. The judge was
11 the Judge that placed plaintiff under protective service
12 under which he died and where other wrongful death suits
13 plaintiffs are dying (RICO CLAIM). And The defendant Judge
14 of Williamsburg made his judgment on false information,
15 tainted information, with/and given by; defendants: Brittany
16 Moore, Jeremy McCallup, Fahad Al-Jarboua, Deborah Al-
17 Jarboua, Wendy Evans, City of Williamsburg Human Services
18 and Envoy of Williamsburg and defendant Brian Stevenson Jr.
19 who knew Envoy of Williamsburg was not in compliance and
20 should not have taken any more clients until compliance was
21 achieved. BUT defendant Haung is not/was not capable of
22 accomplishing compliance with the MANY violation of state
23 and federal laws defendant Envoy of Williamsburg was
24 sanctioned for July 2018- September 2019 when it was shut
25 down/closed down.
- 26 6. The defendant Judge of Williamsburg should have been aware
27 of the unlawful violations of state and federal law by
28 defendant Envoy of Williamsburg, before placing plaintiff in
their hands (Envoy of Williamsburg) 2018. Defendant Judge of
Williamsburg definitely knew about the violations when
Plaintiff filed my law suits 4-5 times and the filings were
rejected with no reason, no case number. Plaintiff couldn't
appeal the decision because the defendant pretended that the
filing and the plaintiffs injuries never happened. Denying
plaintiffs the right to appeal.
7. Wherefore, causing plaintiffs damages, grief, undue
stressors, emotional distress, fees, fines sabotaging
plaintiffs statue of limitations, obstructing Justice. And
plaintiff is entitled to damages demanded herein of
\$3,000,000.00 PLUS Punitive damages and the courts have held
that pro per litigants can receive attorney type fees for
litigations/working, just like in probate matters; the
administrator is paid for all hours worked on the
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
Jerry Theodore McCallup JR Beneficiary and Power of attorney

1 and medical Power of Attorney documented with the military
 2 and other courts in other states including Virginia. No
 3 court, no hospital, NO action concerning Plaintiff Jerry
 Theodore McCallup JR. can proceed without Plaintiff Dr.
 Veronica McCallup DSc.

4 Footnote: 42 U.S.C. § 1983 (1976) provides: Every person who,
 5 under color of any statute, ordinance, regulation, custom, or
 6 usage, of any State or Territory, subjects, or causes to be
 7 subjected, any citizen of the United States or any other person
 8 within the jurisdiction thereof to the deprivation of any
 9 rights, privileges, or immunities secured by the Constitution
 and laws, shall be liable to the party injured in an action at
 10 law, suit in equity, or other proper proceeding for redress. 3.
 403 U.S. 388 (1971) (violation of fourth amendment). 4. In
 11 Davis v. Passman, 99 S. Ct. 2264 (1979), the Court extended
 Bivens beyond the fourth amendment by implying a cause of
 12 action and a damages remedy under the equal protection
 component of the due process clause of the fifth amendment. 5.
 Throughout this Article the terms "Bivens litigation" and
 13 "Bivens action" will be used interchangeably to describe a
 private action against a federal official to redress a
 14 constitutional violation. The word "Bivens" will be used to
 describe the case itself. 6. In 1960, 280 lawsuits were filed
 15 under § 1983. The annual total increased to 3,985 by 1970 and
 to 12,313 in 1977. Newman, Suing the Lawbreakers: Proposals to
 16 Strengthen the Section 1983 Damage Remedy for Law Enforcers'
 Misconduct, 87 YALE L.J. 447, 452 (1978)
 17

18 **CLAIM II 42 USC.1983 42 U.S. Code 1983 state actor uses the**
 19 **legal system to deprive plaintiffs of their constitutional**
rights. DEMAND: \$3,000,000.00

20 Defendants: Williamsburg Department of Human Services social
 21 services Division , Scarlett Huang (compliance officer) Envoy of
 22 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 23 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 24 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy
 25 McCallup Wife, Fahad Al-Jarboua , County of James city county,
 Brain L. Stevenson Jr, State of Virginia, State of Virginia
 26

27 1. Plaintiff re-affirms all the aforesaid herein and state:

28 2. Wherefore, causing plaintiffs damages, grief, undue
 stressors, emotional distress, fees, fines sabotaging
 plaintiffs statue of limitations, obstructing Justice. And

1 plaintiff is entitled to damages demanded herein of
 2 \$3,000,000.00 PLUS Punitive damages and the courts have held
 3 that pro per litigants can receive attorney type fees for
 4 litigations/working, just like in probate matters; the
 5 administrator is paid for all hours worked on the
 6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 7 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 8 and medical Power of Attorney documented with the military
 9 and other courts in other states including Virginia. No
 10 court, no hospital, NO action concerning Plaintiff Jerry
 11 Theodore McCallup JR. can proceed without Plaintiff Dr.
 12 Veronica McCallup DSc.

9 **CLAIM III Title 18, U.S.C., Section 241 - Conspiracy Against**
 10 **Rights DEMAND \$3,000,000.00**

11 Defendants: Williamsburg Department of Human Services social
 12 services Division , Scarlett Huang (compliance officer) Envoy of
 13 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 14 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 15 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy
 16 McCallup Wife, Fahad Al-Jarboua, County of James city county,
 17 Brain L. Stevenson Jr, State of Virginia

- 17 1. Plaintiff re-affirms all the aforesaid herein and state:
- 18 2. That plaintiff had the right to medical treatment in another
 19 state and defendants Deborah Al-Jarboua, Fahad Al-Jarboua,
 20 Jeremy McCallup, Jeremy Mccallup wife Jerry Theodore
 21 McCallup III, wendy Evans, Britanny Moore, Consulate Health
 22 Care, Envoy of Williamsburg, Sentara Health Care, City of
 23 Williamsburg, James city county, knew that Defendant Jeremy
 24 McCallup has some type/kind of mental slowness, mental
 25 deficit and cannot be responsible for human life, But they
 26 all , and with MORE co-conspirators, didn't want plaintiff
 27 Dr. Veronica McCallup DSc involved. They co-conspired to get
 28 Plaintiffs money and life.

CLAIM IV 18 USC 242: Deprivation of rights under color of law
DEMAND \$3,000,000.00

Defendants: Williamsburg Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr , Consulate Health Care , State of Virginia

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Defendants violated plaintiffs Tier 4 HIPPA Violations. The penalties for violations of HIPAA Rules can be severe. HHS Office for Civil Rights can issue fines of up to \$1.5 million per violation category, per year. In this action 3 years time 1.5 million for HIPPA and 13 million for loss of business and

i. While healthcare providers, health plans, and business associates of covered entities can be fined, there are also potential fines for individuals who violate HIPAA Rules and criminal penalties may be appropriate. A jail term for violating HIPAA is a possibility, with some violations carrying a penalty of up to 10 years in jail.

3. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and

1 medical Power of Attorney documented with the military and
2 other courts in other states including Virginia. No court, no
3 hospital, NO action concerning Plaintiff Jerry Theodore
4 McCallup JR. can proceed without Plaintiff Dr. Veronica
5 McCallup DSc.

6 **CLAIM V HIPPA VIOLATIONS Impermissible disclosures of protected**
7 **health information (PHI)** Damage Demand \$1,500,000.00 PER

8 **VIOLATION**

9 Defendants: Williamsburg Department of Human Services social
10 services Division, Wendy Evans Williamsburg human services,
11 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry
12 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
13 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
14 county, Brain L. Stevenson Jr

- 15 1. Plaintiff affirms all aforesaid and state: Plaintiff cause
16 of death is listed as "Diabetes, seizures, High Blood
17 Pressure". All of these conditions are treatable with diet.
- 18 2. **Employees disclosing information** - Employees' gossiping
19 about patients to friends or coworkers is also a HIPAA
20 violation that can cost a practice a significant fine.
21 Employees must be mindful of their environment, restrict
22 conversations regarding patients to private places, and
23 avoid sharing any patient information with friends and
24 family.

25 **Texting patient information** - Texting patient information such as
26 vital signs or test results is often an easy way that providers
27 can relay information quickly. While it may seem harmless, it is
28 potentially placing patient data in the hands of cyber criminals
who could easily access this information. There are new
encryption programs that allow confidential information to be
safely texted, but both parties must have it installed on their
wireless device, which is typically not the case.

5. Social Media - Posting patient photos on social media is a
HIPAA violation. While it may seem harmless if a name is not
mentioned, someone may recognize the patient and know the

1 doctor's specialty, which is a breach of the patient's privacy.
2 Make sure all employees are aware that the use of social media to
3 share patient information is considered a violation of HIPAA law.

4 **6. Employees illegally accessing patient files** - Employees
5 accessing patient information when they are not authorized is
6 another very common HIPAA violation. Whether it is out of
7 curiosity, spite, or as a favor for a relative or friend, this is
8 illegal and can cost a practice substantially. Also, individuals
9 that use or sell PHI for personal gain can be subject to fines
10 and even prison time.

11 **7. Social breaches** - An accidental breach of patient information
12 in a social situation is quite common, especially in smaller more
13 rural areas. Most patients are not aware of HIPAA laws and may
14 make an innocent inquiry to the healthcare provider or clinician
15 at a social setting about their friend who is a patient. While
16 these types of inquiries will happen, it is best to have an
17 appropriate response planned well in advance to reduce the
18 potential of accidentally releasing private patient information.

19 **8. Authorization Requirements** - A written consent is required for
20 the use or disclosure of any individual's personal health
21 information that is not used for treatment, payment, healthcare
22 operations, or permitted by the Privacy Rule. If an employee is
23 not sure, it is always best to get prior authorization before
24 releasing any information.

25 ii. Plaintiff was in the United States Military 25-26 years.
26 Retired with NO health issues out of Chicago Illinois and
27 was employed as something like a civilian medical Nursing
28 observer for the military Nurses around the world. His
29 health was always under care and observation.

30 iii. For defendant Brittany Moore to seek a court order; to
31 place Plaintiff under adult protective services and force
32 him out of his home; for NOT taking a pill against his
33 religious beliefs, culture and Religious dietary
34 guidelines and restrictions, amounts to: medical
35 malpractice, Reckless endangerment, Negligence, Wrongful
36 death and violates Religious Right to diet.

iv. Defendants Sentara Williamsburg Regional Medical Center and other Medical facilities, doctors, wrongful diagnosis plaintiff and unlawfully administering medications without Power of attorney and medical power of attorney, which amounts to malpractice.

v. Plaintiff had a knee injury that the United States Military was treating and these defendants allowed plaintiff to suffer extensively without treating the knee and administering contra-indicating medicines. The pain in plaintiff's knee obvious cause the plaintiff's blood pressure to show FALSE elevations and Plaintiff being in duress, caused FALSE blood pressure readings.

3. AS a Result of these actions Defendant(s) Caused the Death of Jerry Theodore McCallup Jr. and plaintiff seek the said damages. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can proceed without Plaintiff Dr. Veronica McCallup DSc.

CLAIM VI HIPPA VIOLATIONS Unauthorized accessing of PHI Damage

Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup Wife, Fahad Al-Jarboua Envoy of Williamsburg, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all aforesaid.

1 **Texting patient information** - Texting patient information such as
 2 vital signs or test results is often an easy way that providers
 3 can relay information quickly. While it may seem harmless, it is
 4 potentially placing patient data in the hands of cyber criminals
 5 who could easily access this information. There are new
 6 encryption programs that allow confidential information to be
 7 safely texted, but both parties must have it installed on their
 8 wireless device, which is typically not the case.

9 **5. Social Media** - Posting patient photos on social media is a
 10 HIPAA violation. While it may seem harmless if a name is not
 11 mentioned, someone may recognize the patient and know the
 12 doctor's specialty, which is a breach of the patient's privacy.
 13 Make sure all employees are aware that the use of social media to
 14 share patient information is considered a violation of HIPAA law.

15 **6. Employees illegally accessing patient files** - Employees
 16 accessing patient information when they are not authorized is
 17 another very common HIPAA violation. Whether it is out of
 18 curiosity, spite, or as a favor for a relative or friend, this is
 19 illegal and can cost a practice substantially. Also, individuals
 20 that use or sell PHI for personal gain can be subject to fines
 21 and even prison time.

22 **7. Social breaches** - An accidental breach of patient information
 23 in a social situation is quite common, especially in smaller more
 24 rural areas. Most patients are not aware of HIPAA laws and may
 25 make an innocent inquiry to the healthcare provider or clinician
 26 at a social setting about their friend who is a patient. While
 27 these types of inquiries will happen, it is best to have an
 28 appropriate response planned well in advance to reduce the
 potential of accidentally releasing private patient information.

8. Authorization Requirements - A written consent is required for
 the use or disclosure of any individual's personal health
 information that is not used for treatment, payment, healthcare
 operations, or permitted by the Privacy Rule. If an employee is
 not sure, it is always best to get prior authorization before
 releasing any information.

9. Wherefore, causing plaintiffs damages, grief, undue
 stressors, emotional distress, fees, fines sabotaging
 plaintiffs statue of limitations, obstructing Justice. And

1 plaintiff is entitled to damages demanded herein of
 2 \$3,000,000.00 PLUS Punitive damages and the courts have held
 3 that pro per litigants can receive attorney type fees for
 4 litigations/working, just like in probate matters; the
 5 administrator is paid for all hours worked on the
 6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 7 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 8 and medical Power of Attorney documented with the military
 9 and other courts in other states including Virginia. No
 10 court, no hospital, NO action concerning Plaintiff Jerry
 11 Theodore McCallup JR. can proceed without Plaintiff Dr.
 12 Veronica McCallup DSc.

9 **CLAIM VII HIPPA VIOLATIONS Failure to conduct a risk analysis**

10 Damage Demand \$1,500,000.00 PER VIOLATION

11 Defendants: Williamsburg Department of Human Services social
 12 services Division, Wendy Evans Williamsburg human services,
 13 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry
 14 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
 15 Jeremy McCallup Wife, Fahad Al-Jarboua, Envoy of Williamsburg,
 16 County of James city county

17 1. Plaintiff affirms all aforesaid and state:

18 **2. Lost or Stolen Devices** - Theft of PHI (protected health
 19 information) through lost or stolen laptops, desktops,
 20 smartphones, and other devices that contain patient
 21 information can result in HIPAA fines. Mobile devices are
 22 the most vulnerable to theft because of their size;
 23 therefore, the necessary safeguards should be put into place
 24 such as password protected authorization and encryption to
 25 access patient-specific information.

26 **3. Accessing patient information on home computers** - Most
 27 clinicians use their home computers or laptops after hours
 28 from time to time to access patient information to record
 notes or follow-ups. This could potentially result in a
 HIPAA violation if the screen is accidentally left on and a
 family member uses the computer. Make sure your computer and
 laptop are password protected and keep all mobile devices
 out of sight to reduce the risk of patient information being
 accessed or stolen.

1 4. **Lack of training** - One of the most common reasons for a
 2 HIPAA violation is an employee who is not familiar with
 3 HIPAA regulations. Often only managers, administration, and
 4 medical staff receive training although HIPAA law requires
 5 all employees, volunteers, interns and anyone with access to
 6 patient information to be trained. Compliance training is
 7 one of the most proactive and easiest ways to avoid a
 8 violation.

9 5. Wherefore, causing plaintiffs damages, grief, undue
 10 stressors, emotional distress, fees, fines sabotaging
 11 plaintiffs statue of limitations, obstructing Justice. And
 12 plaintiff is entitled to damages demanded herein of
 13 \$3,000,000.00 PLUS Punitive damages and the courts have held
 14 that pro per litigants can receive attorney type fees for
 15 litigations/working, just like in probate matters; the
 16 administrator is paid for all hours worked on the
 17 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 18 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 19 and medical Power of Attorney documented with the military
 20 and other courts in other states including Virginia. No
 21 court, no hospital, NO action concerning Plaintiff Jerry
 22 Theodore McCallup JR. can precede without Plaintiff Dr.
 23 Veronica McCallup DSc.

24 **CLAIM VIII WRONGFUL DEATH** Damage Demand \$3,000,000.00

25 Defendants: Williamsburg Department of Human Services social
 26 services Division, Envoy of Williamsburg, Wendy Evans

27 Williamsburg human services, Brittany Moore, Consulate Heath
 28 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah
 Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-
 Jarboua, County of James city county, Brain L. Stevenson Jr ,
 State of Virginia

Plaintiff re-affirms all aforesaid and state: AS a Result of
 these defendants actions Defendant(s) Caused the Death of Jerry
 Theodore McCallup Jr. and due to a preventable medical error or
 the reckless/negligent behavior of another and plaintiff seek the

1 said damages. The defendant Jeremy and Deborah Al-jarboau and
 2 Fahad and the human services, pull the plug on Plaintiff Jerry
 3 Theodore McCallup without contacting his son Jerry Theodore
 4 McCallup III and his power of attorney Dr. Veronica Renee
 5 MCcallup DSc.

6 i. Wrongful Death This Civil action and Complaint is for
 7 damages sustained by plaintiff(s) for the malicious and
 8 intentional actions and wrongful death caused by
 9 defendants, they have cause the wrongful death of
 10 plaintiff using trickery, theft of identification,
 11 deprivation of medical care . VA 8.01 -50 VA 8.01 - 244 1977
 12 c.617, 1958 c 470, 1981 c 115, 2012 c 725 Shepard v.
 13 Capitol Foundry of Va., 262 Va. 715, 718-719 (Va. 2001)
 14 ii. Deprivation of Medical Care and medical care in another State
 15 iii. Several HIPAA violations which are failure to comply with
 16 any aspect of HIPAA standards and provisions detailed in
 17 detailed in 45 CFR Parts 160, 162, and 164.
 18 iv. Defendants Administered contraindicated medicines to
 19 plaintiff Jerry Theodore McCallup Jr, that caused him
 20 seizures and brain injury , Renal Failure, and death;
 21 against plaintiffs continual complaints that those
 22 medicines being contraindicative to him. This is proven by
 23 the defendants illegally having to forcibly get an illegal
 24 court order and forcibly administer contraindicative drugs
 25 before and after February 2019 and defendants continually
 26 forcing medicines on Plaintiff through and including
 27 February 2019 until about March 2, 2019 when plaintiff
 28 died from the prior times of forced drugging. Plaintiff is
 a retired military vet that didn't have any medical
 problems that would cause death. The defendant had been an
 athlete all his life and father was a professional athlete
 and sister an athlete. Athletics and health conscience is
 a family trait.

2. Wherefore, causing plaintiffs damages, grief, undue stressors,
 emotional distress, fees, fines sabotaging plaintiffs statue of
 limitations, obstructing Justice. And plaintiff is entitled to
 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
 and the courts have held that pro per litigants can receive
 attorney type fees for litigations/working, just like in probate
 matters; the administrator is paid for all hours worked on the
 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
 Theodore McCallup JR Beneficiary and Power of attorney and
 medical Power of Attorney documented with the military and other
 courts in other states including Virginia. No court, no hospital,

1 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
2 precede without Plaintiff Dr. Veronica McCallup DSc.

3 **CLAIM IX ELDER ABUSE** Damage Demand of 1,500,000.00 .

4 Defendants: Scarlett Huang (compliance officer),
5 Williamsburg Department of Human Services social services
6 Division, Envoy of Williamsburg, Wendy Evans Williamsburg human
7 services, Brittany Moore, Consulate Heath Care, Sentara Health
8 Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy
9 Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James
city county , Brain L. Stevenson Jr, State of Virginia

10 1. Plaintiff re-affirms all the aforesaid herein and state:

11 2. The defendants: City of Williamsburg, Williamsburg human
12 service, Jeremy Mccallup, Deborah Al-Jarboua, Fahad Al-
13 Jarboua and Jeremy McCallup wife had plaintiff in a motel 6,
14 when he received \$3,400-\$4,900.00 per month in income. The
15 county could have found a senior apartment for Mr. Jerry
16 McCallup Jr. Code of Virginia **Title 18.2. Crimes and**
17 **Offenses Generally » Chapter 8. Crimes Involving Morals and**
18 **Decency » Article 4. Family Offenses; Crimes Against**
19 **Children, Etc. » § 18.2-369. Abuse and neglect of**
20 **incapacitated adults; penalty**

21 3. Plaintiff further supports the theory that plaintiff knew
22 defendants were trying to rob him/swindle him about 2014.
23 Plaintiff tried to separate from the Cuban/Arab defendants and
24 plaintiff \$350,000 home entered foreclosure after owning the
home and another house and properties over twenty (20) years.

25 4. Plaintiff believes these defendants had been poisoning
26 plaintiff in the home; prior to any medical conditions and rush
27 to have plaintiff cremated before plaintiff family learned of
28 plaintiffs death. Plaintiff had enough money for burial and
plaintiff family is against cremations defendants cremated to
cover up drugging of Plaintiff Jerry Theodore McCallup JR.
Plaintiff has requested medicl files for a year and defendants
have fail to release them as though they are changing the
records.

5. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM X FINANCIAL ELDER ABUSE Demand demand \$1,500,000.00

misappropriation of financial resources or abusive use of financial control, in the context of a relationship where there is an expectation of trust, causes harm to an older person.

Defendants: Williamsburg Department of Human Services social services Division , Scarlett Huang (compliance officer), Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. The Older Americans Act of 2006 defines elder financial abuse, or financial exploitation, as "the fraudulent or otherwise illegal, unauthorized, or improper act or process of an individual, including a caregiver or fiduciary, that uses the resources of an older individual for monetary or personal benefit, profit, or gain, or that results in depriving an older individual of rightful access to, or use of, benefits, resources, belongings, or assets.

3. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of

1 limitations, obstructing Justice. And plaintiff is entitled to
 2 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
 3 and the courts have held that pro per litigants can receive
 4 attorney type fees for litigations/working, just like in probate
 5 matters; the administrator is paid for all hours worked on the
 6 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
 7 Theodore McCallup JR Beneficiary and Power of attorney and
 8 medical Power of Attorney documented with the military and other
 9 courts in other states including Virginia. No court, no hospital,
 10 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
 11 precede without Plaintiff Dr. Veronica McCallup DSc.

12 **CLAIM XI HIPPA VIOLATIONS Failure to manage risks to the**
 13 **confidentiality, integrity, and availability of PHI** Damage Demand
 14 \$3,500,000.00 PER VIOLATION

15 Defendants: Scarlett Huang (compliance officer), Envoy of
 16 Williamsburg, Brittany moore, wendy evans, city of Williamsburg,
 17 state of virginia , Consulate Health Care, Sentara Health Care,

- 18 1. Plaintiff affirms all aforesaid and state: These defendants
 19 never identified that the persons they relied on for advice
 20 and that authorized medications to plaintiff did NOT have
 21 the authority to make decisions for Plaintiff Jerry Theodore
 22 McCallup JR. 2014-2019, 2018-2019, even at time of death
 23 when the defendants Al-Jarboua told defendant Envoy of
 24 Williamsburg to pull the plug (per written records).
- 25 2. **Medical records mishandling** - Another very common HIPAA
 26 violation is the mishandling of patient records. If a
 27 practice uses written patient charts or records, a physician
 28 or nurse may accidentally leave a chart in the patient's
 exam room available for another patient to see. Printed
 medical records must be kept locked away and safe out of the
 public's view.
3. AS a Result of these defendants actions Defendant(s) Caused
 the Death of Jerry Theodore McCallup Jr. and plaintiff seek
 the said damages. Wherefore, causing plaintiffs damages,
 grief, undue stressors, emotional distress, fees, fines

sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XII HIPPA VIOLATIONS Failure to implement safeguards to ensure the confidentiality, integrity, and availability of PHI

Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Scarlett Huang (compliance officer), Envoy of Williamsburg, County of James city county

1. Plaintiff re-affirms all the aforesaid herein and state:
2. Defendant Deborah al-jarboua is on all Plaintiff Jerry Theodore Medical records causing him to be given medications adverse to him and our family. She is listed as his wife. She isn't his wife, it's a lie. And that Plaintiffs death is a result of this woman and defendants failing safeguard the elderly and ensure the confidentiality of patients medical history. Plaintiff was given blood pressure pills in 1999 and learned that he could not take them and that the problem was his food. He changed his diet them. So medication thereafter is from Defendants all doctors over prescribing and not adjusting plaintiffs medication before seizures and taking the advice of defendants al-jarboua's.
3. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive

attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XIII HIPPA VIOLATIONS Failure to maintain and monitor PHI

access logs Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Scarlett Huang (compliance officer) , Envoy of Williamsburg, Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county

1. Plaintiff re-affirms all the aforesaid herein and state:
2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XIV HIPPA VIOLATIONS Failure to enter into a HIPAA-

compliant business associate agreement with vendors prior to

giving access to PHI Damage Demand \$1,500,000.00 PER VIOLATION

1 Defendants: Envoy of Williamsburg, Williamsburg Department of
 2 Human Services social services Division , Scarlett Huang
 3 (compliance officer) Envoy of Williamsburg, Wendy Evans
 4 Williamsburg human services, Brittany Moore, Consulate Heath
 5 Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah
 6 Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-
 7 Jarboua, Brain L. Stevenson Jr , All doctors on records still in
 8 discovery

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue
 stressors, emotional distress, fees, fines sabotaging
 plaintiffs statue of limitations, obstructing Justice. And
 plaintiff is entitled to damages demanded herein of
 \$3,000,000.00 PLUS Punitive damages and the courts have held
 that pro per litigants can receive attorney type fees for
 litigations/working, just like in probate matters; the
 administrator is paid for all hours worked on the
 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 and medical Power of Attorney documented with the military
 and other courts in other states including Virginia. No
 court, no hospital, NO action concerning Plaintiff Jerry
 Theodore McCallup JR. can precede without Plaintiff Dr.
 Veronica McCallup DSc.

CLAIM XV HIPPA VIOLATIONS Failure to maintain and monitor PHI
access logs Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social
 services Division, Envoy of Williamsburg, Department of Human
 Services social services Division , Scarlett Huang (compliance
 officer) Envoy of Williamsburg, Wendy Evans Williamsburg human
 services, Brittany Moore, Consulate Heath Care, Sentara Health
 Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy
 Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L.
 Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XVI HIPPA VIOLATIONS Failure to provide patients with

copies of their PHI on request Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Scarlett Huang (compliance officer), Envoy of Williamsburg , Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XVII HIPPA VIOLATIONS Failure to implement access controls
to limit who can view PHI Damage Demand \$1,500,000.00 PER

VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Brain L. Stevenson Jr , Scarlett Huang

(compliance officer), Envoy of Williamsburg, Wendy Evans
Williamsburg human services, Brittany Moore, Consulate Heath
Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah
Al-Jarboua, Jeremy Mccallup ,Jeremy McCallup Wife, Fahad Al-
Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors,
emotional distress, fees, fines sabotaging plaintiffs statue of
limitations, obstructing Justice. And plaintiff is entitled to
damages demanded herein of \$3,000,000.00 PLUS Punitive damages
and the courts have held that pro per litigants can receive
attorney type fees for litigations/working, just like in probate
matters; the administrator is paid for all hours worked on the
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
Theodore McCallup JR Beneficiary and Power of attorney and
medical Power of Attorney documented with the military and other
courts in other states including Virginia. No court, no hospital,
NO action concerning Plaintiff Jerry Theodore McCallup JR. can
precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XVIII HIPPA VIOLATIONS The disclosure more PHI than is

necessary for a particular task to be performed Damage Demand

\$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social
services Division, Envoy of Williamsburg, Scarlett Huang
(compliance officer) Envoy of Williamsburg, Wendy Evans

Williamsburg human services, Brittany Moore, Consulate Heath
Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah
Al-Jarboua, Jeremy Mccallup, Brain L. Stevenson Jr , Jeremy
McCallup Wife, Fahad Al-Jarboua, County of James city county

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors,
emotional distress, fees, fines sabotaging plaintiffs statue of
limitations, obstructing Justice. And plaintiff is entitled to
damages demanded herein of \$3,000,000.00 PLUS Punitive damages
and the courts have held that pro per litigants can receive

attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XIX HIPAA VIOLATIONS Failure to provide HIPAA training and security awareness training Damage Demand \$1,500,000.00 PER

VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Envoy of Williamsburg, Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XX HIPAA VIOLATIONS Theft of patient records Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social services Division, Envoy of Williamsburg, Department of Human

Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXI HIPPA VIOLATIONS Unauthorized release of PHI to

individuals not authorized to receive the information Damage

Demand \$1,500,000.00 PER VIOLATION

Defendants: Williamsburg Department of Human Services social

services Division, Envoy of Williamsburg , Scarlett Huang

(compliance officer), Envoy of Williamsburg, Wendy Evans

Williamsburg human services, Brittany Moore, Consulate Heath

Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah

Al-Jarboua, Jeremy Mccallup , Jeremy McCallup Wife, Fahad Al-

Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for

litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXII HIPPA VIOLATIONS Sharing of PHI online or via social media without permission Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Envoy of Williamsburg, Williamsburg Department of Human Services social services Division , Scarlett Huang (compliance officer), Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXIII HIPPA VIOLATIONS Mishandling and mismailing PHI

Damage Demand \$1,500,000.00 PER VIOLATION

Defendants: Envoy of Williamsburg, Williamsburg Department of Human Services social services Division , Scarlett Huang (compliance officer), Wendy Evans Williamsburg human services,

1 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry
 2 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy
 3 McCallup Wife, Fahad Al-Jarboua, County of James city county

4 1. Plaintiff re-affirms all the aforesaid herein and state:

5 2. Wherefore, causing plaintiffs damages, grief, undue stressors,
 6 emotional distress, fees, fines sabotaging plaintiffs statue of
 7 limitations, obstructing Justice. And plaintiff is entitled to
 8 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
 9 and the courts have held that pro per litigants can receive
 10 attorney type fees for litigations/working, just like in probate
 11 matters; the administrator is paid for all hours worked on the
 12 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
 13 Theodore McCallup JR Beneficiary and Power of attorney and
 14 medical Power of Attorney documented with the military and other
 15 courts in other states including Virginia. No court, no hospital,
 16 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
 17 precede without Plaintiff Dr. Veronica McCallup DSc.

14 **CLAIM XXIV HIPPA VIOLATIONS Failure to encrypt PHI or use an**
 15 **alternative, equivalent measure to prevent unauthorized**

16 **access/disclosure** Damage Demand \$1,500,000.00 PER VIOLATION
 17 Defendants: Envoy of Williamsburg, Williamsburg Department of
 18 Human Services social services Division , Scarlett Huang

19 (compliance officer), Wendy Evans Williamsburg human services,
 20 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry
 21 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup,
 22 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
 23 county

24 1. Plaintiff re-affirms all the aforesaid herein and state:

25 2. Wherefore, causing plaintiffs damages, grief, undue stressors,
 26 emotional distress, fees, fines sabotaging plaintiffs statue of
 27 limitations, obstructing Justice. And plaintiff is entitled to
 28 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
 and the courts have held that pro per litigants can receive
 attorney type fees for litigations/working, just like in probate
 matters; the administrator is paid for all hours worked on the
 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
 Theodore McCallup JR Beneficiary and Power of attorney and
 medical Power of Attorney documented with the military and other

1 courts in other states including Virginia. No court, no hospital,
2 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
3 precede without Plaintiff Dr. Veronica McCallup DSc.

4 **CLAIM XXV HIPPA VIOLATIONS Failure to notify an individual (or**
5 **the Office for Civil Rights) of a security incident involving PHI**
6 **within 60 days of the discovery of a breach** Damage Demand

7 \$1,500,000.00 PER VIOLATION

8 Defendants: Williamsburg Department of Human Services social
9 services Division, Envoy of Williamsburg , Scarlett Huang
10 (compliance officer), Wendy Evans Williamsburg human services,
11 Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry
12 Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup,
13 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
14 county

15 1. Plaintiff re-affirms all the aforesaid herein and state:

16 2. Wherefore, causing plaintiffs damages, grief, undue stressors,
17 emotional distress, fees, fines sabotaging plaintiffs statue of
18 limitations, obstructing Justice. And plaintiff is entitled to
19 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
20 and the courts have held that pro per litigants can receive
21 attorney type fees for litigations/working, just like in probate
22 matters; the administrator is paid for all hours worked on the
23 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
24 Theodore McCallup JR Beneficiary and Power of attorney and
25 medical Power of Attorney documented with the military and other
26 courts in other states including Virginia. No court, no hospital,
27 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
28 precede without Plaintiff Dr. Veronica McCallup DSc.

29 **CLAIM XXVI HIPPA VIOLATIONS Failure to conduct a risk analysis**

30 \$1,500,000.00

31 Defendants: Williamsburg Department of Human Services social
32 services Division, Scarlett Huang (compliance officer),
33 Envoy of Williamsburg, County of James city county, Brain L.
34 Stevenson Jr

35 1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXVII HIPPA VIOLATIONS Texting PHI \$1,500,000.00

Defendants: Williamsburg Department of Human Services social services Division, Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXVIII HIPPA VIOLATIONS Failure to terminate access rights to PHI when no longer required 1,500,000.00

1 Defendants: Williamsburg Department of Human Services social
 2 services Division, Scarlett Huang (compliance officer) Envoy of
 3 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 4 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 5 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
 6 Jeremy McCallup Wife, Fahad Al-Jarboua, Brain L. Stevenson Jr

7 1. Plaintiff re-affirms all the aforesaid herein and state:

8 2. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
 9 sister, Dr. Veronica McCallup DSc and defendants refused to
 10 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power
 11 of Attorney). He would have moved in with his sister.

12 3. Plaintiffs are Native American Indians who have been to college
 13 and Universities exceeding associate degrees in Science
 14 Technology and Medicine. Plaintiffs had a business together that
 15 they ran from Detroit Michigan. Chicago, IL, California, and
 16 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The
 17 killing, poisoning, hindering, blocking of plaintiffs contact
 18 with sister and business, obstruction, Interference was malicious
 19 and intentional, willful and wonton.

20 4. Defendants Never had Jurisdiction to place plaintiff under
 21 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
 22 all the family and plaintiffs; that there was court hearings or
 23 to any court hearing or court action. to place plaintiff under
 24 protective services was unlawful and done by NON_FAMILY MEMBERS
 25 in co-conspiracy with Williamsburg social services and defendant
 26 Britany Moore. under these deprivation of rights and lack of due
 27 process; plaintiff died and defendants basically KIDNAPPED
 28 plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are
 NOT family members. The Cubans and Arabs are NOT family members,
 they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T
 married) and plaintiff son in Colorado (plaintiff son in Colorado
 wasn't in Virginia)). Jeremy McCallup was a married man and
 caused Jerry Theodore McCallup Jr Williamsburg house to go into
 foreclosure by deception. (the bills were paid, everything was
 taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a
 monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity
 in the house. There's no reason to lose the home except Defendant
 Jeremy McCallup, Fahad Al-jarboua and Deborah Al-jarboua scheme.
 Defendant Jeremy McCallup was 20- 22 years old and had gotten
 married and wanted the house.

5. Defendants were discriminating against Plaintiff and forcing
 death upon plaintiff; because of his race, creed, nationality and
 culture. On plaintiff birth certificate and death certificate it

documents that plaintiff is a native American, an Indian.
Plaintiff health could be treated with diet.

6. Plaintiffs recently learned that defendants used and allowed defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy McCallup to pretend to be and to steal the identity of and aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff son; in order, to locate plaintiff money, insurance policies and property.

7. Plaintiff learned that defendants wanted the plaintiff Jerry Theodore McCallup Jr dead/to die; to collect his money, bank accounts, insurances, and property and to ensure death, they blocked tricked, would not contact, plaintiff Jerry Theodore McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a medical doctor and who has been treating plaintiff holistically until plaintiff met the Cubans/arabs (al-jarboua's).

8. Hospital records and social service records and State records and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua was in continual contact with defendants and that defendant Brittany moore and her supervisor "Evans" and the James city county Williamsburg and Envoy of Williamsburg used the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy McCallup) recommendations to treat and medicate and kill plaintiff Jerry Theodore McCallup Jr.

9. Defendants Negligence caused another death during the same time frame, same location, same gender, same age group and under the same staff. This indicates that Defendant Scarlett Huag is in the morbid business and not compliance business. Two deaths with in a week of each other obviously indicate Envoy of Williamsburg is into murder.

10. All Defendants co-conspired to cause Plaintiffs death, even after plaintiff informed defendants he didn't take medications.

11. All Defendants Reckless and wanton conduct caused Plaintiffs wrongful death. All plaintiff's medical conditions could be treated with diet. Patients with Identical conditions are treated with diet ALL OVER THE WORLD.

12. Defendants of the Adult Protective Services division, abused power and co-conspired to cause plaintiff death with (the Cubans/Arabs Al-Jarboau's who are unauthorized persons violating HIPPA LAWS.

13. This wrongful death complaint cause of action, civil complaint has caused a. sorrow, b. mental anguish, c. loss of companionship and d. business partnership.

14. Plaintiff seeks Compensation for reasonably expected loss income from loss of business provided by the decedent.

15. Plaintiff seeks Expenses for the care and treatment and hospitalization of the decedent resulting in death and return of

1 all expenses paid for unauthorized treatments and
2 hospitalization.

3 16.Plaintiff seeks Funeral expenses and burial expenses because
4 the cremation is in a bottle on the table.

5 17.Plaintiff seeks Punitive Damages

6 18.Plaintiff seeks compensatory damages

7 19.Dr. Veronica McCallup DSc is Plaintiff Administrator and
8 Executor and is also Plaintiffs Beneficiary and Power of attorney
9 and Medical Power of Attorney. However, was not ever contacted,
10 called, emailed, found on facebook nor any other social media in
11 violation of due process. And seek awards of all damages within
12 this complaint.

13 20.The state last inspection on this facility was July 2018 and
14 no further check ups were made. The state found serious
15 violations at that time, that were not ever corrected. The county
16 should have been aware of these violations and should never have
17 placed the plaintiff there, nor should Jerry Theodore McCallup
18 Jr. have been placed in any hospital. His Doctor sister could
19 have taken him home or to a better care facility.

20 21.Nor should defendants send any person to these violating
21 defendants for any care, hospice care or post care of any kind.
22 The State should care about seniors and not conspire in senior
23 abuse, elder abuse and violation to medicare medicade spending,
24 medicade.

25 22.The Williamsburg Judge is included as a defendant because he
26 knew all parties wasn't served/found/included. And the Judge
27 defendant is the only Judge in town and when plaintiff attempted
28 to file the wrongful death lawsuit in 2019, this Judge would
return the documents without filing. Plaintiff went to Virginia
and personally filed the lawsuit and the Judge refused to allow
plaintiff to file the Lawsuit. Plaintiff a 3rd time filed the
rejected lawsuit and the Judge refused to allow plaintiff to file
the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.

23 23. Wherefore, causing plaintiffs damages, grief, undue
24 stressors, emotional distress, fees, fines sabotaging plaintiffs
25 statue of limitations, obstructing Justice. And plaintiff is
26 entitled to damages demanded herein of \$3,000,000.00 PLUS
27 Punitive damages and the courts have held that pro per litigants
28 can receive attorney type fees for litigations/working, just like
in probate matters; the administrator is paid for all hours
worked on the estate. Plaintiff Dr Veronica McCallup DSc is
Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of
attorney and medical Power of Attorney documented with the
military and other courts in other states including Virginia. No
court, no hospital, NO action concerning Plaintiff Jerry Theodore
McCallup JR. can precede without Plaintiff Dr. Veronica McCallup
DSc.

CLAIM XXIX HIPPA VIOLATIONS Failure to document compliance**efforts** \$1,500,000.00

Defendants: Williamsburg Department of Human Services social services Division, Envoy of Williamsburg, Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city county, Brain L. Stevenson Jr

1. Plaintiff re-affirms all the aforesaid herein and state:

2. Plaintiff Jerry Theodore McCallup Jr repeatedly requested sister, Dr. Veronica McCallup DSc and defendants refused to locate plaintiff. (Beneficiary, Power of Attorney, Medical Power of Attorney). He would have moved in with his sister.

3. Plaintiffs are Native American Indians who have been to college and Universities exceeding associate degrees in Science Technology and Medicine. Plaintiffs had a business together that they ran from Detroit Michigan. Chicago, IL, California, and Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The killing, poisoning, hindering, blocking of plaintiffs contact with sister and business, obstruction, Interference was malicious and intentional, willful and wonton.

4. Defendants Never had Jurisdiction to place plaintiff under ADULT PROTECTIVE SERVICES, and defendants never gave notice to all the family and plaintiffs; that there was court hearings or to any court hearing or court action. to place plaintiff under protective services was unlawful and done by NON_FAMILY MEMBERS in co=conspiracy with Williamsburg social services and defendant Britany Moore. under these deprival of rights and lack of due process; plaintiff died and defendants basically KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are NOT family members. The Cubans and Arabs are NOT family members, they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T married) and plaintiff son in Colorado (plaintiff son in Colorado wasn't in Virginia)). Jeremy McCallup was a married man and caused Jerry Theodore McCallup Jr williamsbug house to go into forclosure by deception. (the bills were paid, everything was taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity in the house. Theres no reason to lose the home except Defendant Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.

1 Defendant Jeremy McCallup was 20- 22 years old and had gotten
 2 married and wanted the house.
 3 5.Defendants were discriminating against Plaintiff and forcing
 4 death upon plaintiff; because of his race, creed, nationality and
 5 culture. On plaintiff birth certificate and death certificate it
 6 documents that plaintiff is a native American, an Indian.
 7 Plaintiff health could be treated with diet.
 8 6.Plaintiffs recently learned that defendants used and allowed
 9 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
 10 McCallup to pretend to be and to steal the identity of and
 11 aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff
 12 son; in order, to locate plaintiff money, insurance policies and
 13 property.
 14 7.Plaintiff learned that defendants wanted the plaintiff Jerry
 15 Theodore McCallup Jr dead/to die; to collect his money, bank
 16 accounts, insurances, and property and to ensure death, they
 17 blocked tricked, would not contact, plaintiff Jerry Theodore
 18 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
 19 medical doctor and who has been treating plaintiff holistically
 20 until plaintiff met the Cubans/arabs (al-jarboua's).
 21 8.Hospital records and social service records and State records
 22 and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua
 23 was in continual contact with defendants and that defendant
 24 Brittany moore and her supervisor "Evans" and the James city
 25 county Williamsburg and Envoy of Williamsburg used the 3
 26 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy
 27 McCallup) recommendations to treat and medicate and kill
 28 plaintiff Jerry Theodore McCallup Jr.
 9.Defendants Negligence caused another death during the same time
 frame, same location, same gender, same age group and under the
 same staff. This indicates that Defendant Scarlett Huag is in the
 morbid business and not compliance business. Two deaths with in a
 week of each other obviously indicate Envoy of Williamsburg is
 into murder.
 10.All Defendants co-conspired to cause Plaintiffs death, even
 after plaintiff informed defendants he didn't take medications.
 11.All Defendants Reckless and wanton conduct caused Plaintiffs
 wrongful death. All plaintiff's medical conditions could be
 treated with diet. Patients with Identical conditions are treated
 with diet ALL OVER THE WORLD.
 12.Defendants of the Adult Protective Services division, abused
 power and co-conspired to cause plaintiff death with (the
 Cubans/Arabs Al-Jarboau's who are unauthorized persons violating
 HIPPA LAWS.
 13.This wrongful death complaint cause of action, civil complaint
 has caused a. sorrow, b. mental anguish, c. loss of companionship
 and d. business partnership.

1 14.Plaintiff seeks Compensation for reasonably expected loss
2 income from loss of business provided by the decedent.

3 15.Plaintiff seeks Expenses for the care and treatment and
4 hospitalization of the decedent resulting in death and return of
all expenses paid for unauthorized treatments and
hospitalization.

5 16.Plaintiff seeks Funeral expenses and burial expenses because
the cremation is in a bottle on the table.Plaintiff seeks
6 Punitive Damages, Plaintiff seeks compensatory damages

7 17.Dr. Veronica McCallup DSc is Plaintiff Administrator and
8 Executor and is also Plaintiffs Beneficiary and Power of attorney
and Medical Power of Attorney. However, was not ever contacted,
called, emailed, found on facebook nor any other social media in
9 violation of due process. And seek awards of all damages within
this complaint.

10 18.The state last inspection on this facility was July 2018 and
11 no further check ups were made. The state found serious
violations at that time, that were not ever corrected. The county
12 should have been aware of these violations and should never have
placed the plaintiff there, nor should Jerry Theodore McCallup
13 Jr. have been placed in any hospital. His Doctor sister could
have taken him home or to a better care facility.

14 19.Nor should defendants send any person to these violating
15 defendants for any care, hospice care or post care of any kind.
The State should care about seniors and not conspire in senior
16 abuse, elder abuse and violation to medicare medicade spending,
medicade.

17 20.The Williamsburg Judge is included as a defendant because he
18 knew all parties wasn't served/found/included. And the Judge
defendant is the only Judge in town and when plaintiff attempted
19 to file the wrongful death lawsuit in 2019, this Judge would
return the documents without filing. Plaintiff went to Virginia
20 and personally filed the lawsuit and the Judge refused to allow
plaintiff to file the Lawsuit. Plaintiff a 3rd time filed the
21 rejected lawsuit and the Judge refused to allow plaintiff to file
the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.

22 21.Wherefore, causing plaintiffs damages, grief, undue stressors,
23 emotional distress, fees, fines sabotaging plaintiffs statue of
24 limitations, obstructing Justice. And plaintiff is entitled to
damages demanded herein of \$3,000,000.00 PLUS Punitive damages
25 and the courts have held that pro per litigants can receive
attorney type fees for litigations/working, just like in probate
26 matters; the administrator is paid for all hours worked on the
estate.Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
27 Theodore McCallup JR Beneficiary and Power of attorney and
28 medical Power of Attorney documented with the military and other
courts in other states including Virginia. No court, no hospital,

1 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
2 precede without Plaintiff Dr. Veronica McCallup DSc.

3 **CLAIM XXX MEDICAL MALPRACTICE**

4 Defendants: ALL doctors on records \$3,000,000.00 in discovery,
5 Envoy of Williamsburg, Williamsburg Department of Human Services
6 social services Division , Scarlett Huang (compliance officer),
7 Wendy Evans Williamsburg human services, Brittany Moore,
8 Consulate Heath Care, Sentara Health Care, Jerry Theodore
9 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup

10 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
11 county, Brain L. Stevenson Jr

12 1. Plaintiff re-affirms all the aforesaid herein and state:

13 2. Wrongful Death This Civil action and Complaint is for
14 damages sustained by plaintiff(s) for the malicious and
15 intentional actions and wrongful death caused by defendants,
16 they have cause the wrongful death of plaintiff using
17 trickery, theft of identification, deprivation of medical care
18 . VA 8.01 -50 VA 8.01 - 244 1977 c.617, 1958 c 470, 1981 c
19 115, 2012 c 725 Shepard v. Capitol Foundry of Va., 262 Va.
20 715, 718-719 (Va. 2001)

21 3. Deprivation of Medical Care and medical care in another State
22 4. Several HIPAA violations which are failure to comply with any
23 aspect of HIPAA standards and provisions detailed in detailed
24 in 45 CFR Parts 160, 162, and 164.

25 5. Defendants Administered contraindicated medicines to
26 plaintiff Jerry Theodore McCallup Jr, that caused him seizures
27 and brain injury , Renal Failure, and death; against plaintiffs
28 continual complaints that those medicines being
contraindicative to him. This is proven by the defendants
illegally having to forcibly get an illegal court order and
forcibly administer contraindicative drugs before and after
February 2019 and defendants continually forcing medicines on
Plaintiff through and including February 2019 until about March
2, 2019 when plaintiff died from the prior times of forced
drugging. Plaintiff is a retired military vet that didn't have
any medical problems that would cause death. The defendant had
been an athlete all his life and father was a professional

1 athlete and sister an athlete. Athletics and health conscience
2 is a family trait.

3 6. Wherefore, causing plaintiffs damages, grief, undue stressors,
4 emotional distress, fees, fines sabotaging plaintiffs statue of
5 limitations, obstructing Justice. And plaintiff is entitled to
6 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
7 and the courts have held that pro per litigants can receive
8 attorney type fees for litigations/working, just like in probate
9 matters; the administrator is paid for all hours worked on the
10 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
11 Theodore McCallup JR Beneficiary and Power of attorney and
12 medical Power of Attorney documented with the military and other
13 courts in other states including Virginia. No court, no hospital,
14 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
15 precede without Plaintiff Dr. Veronica McCallup DSc.

16 **CLAIM XXXI NEGLIGENCE** Damage Demand \$1,700,000.00

17 Defendants: Williamsburg Department of Human Services social
18 services Division, Scarlett Huang (compliance officer), Envoy of
19 Williamsburg, Scarlett Huang (compliance officer), Envoy of
20 Williamsburg, Wendy Evans Williamsburg human services, Brittany
21 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
22 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
23 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
24 county , Brain L. Stevenson Jr

25 1. Plaintiff re-affirms all the aforesaid herein and state:

26 2. Wherefore, causing plaintiffs damages, grief, undue
27 stressors, emotional distress, fees, fines sabotaging
28 plaintiffs statue of limitations, obstructing Justice. And
plaintiff is entitled to damages demanded herein of
\$3,000,000.00 PLUS Punitive damages and the courts have held
that pro per litigants can receive attorney type fees for
litigations/working, just like in probate matters; the
administrator is paid for all hours worked on the
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
Jerry Theodore McCallup JR Beneficiary and Power of attorney
and medical Power of Attorney documented with the military
and other courts in other states including Virginia. No
court, no hospital, NO action concerning Plaintiff Jerry
Theodore McCallup JR. can precede without Plaintiff Dr.
Veronica McCallup DSc.

1 **CLAIM XXXII RECKLESSNESS** Damage Demand \$1,700,000.00

2 Defendants: Williamsburg Department of Human Services social
3 services Division, Scarlett Huang (compliance officer), Envoy of
4 Williamsburg, Department of Human Services social services
5 Division, Scarlett Huang (compliance officer) Envoy of
6 Williamsburg, Wendy Evans Williamsburg human services, Brittany
7 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
8 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, County of
9 James city county Jeremy McCallup Wife, Fahad Al-Jarboua, Brain
L. Stevenson Jr

10 1. Plaintiff re-affirms all the aforesaid herein and state:

11 2.The acts of defendants are careless reckless unwarranted,
12 wanton and intentional. To get a court order is intentional act
13 of aggression against plaintiff's rights.

14 3. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
15 sister, Dr. Veronica McCallup DSc and defendants refused to
16 locate plaintiff. (Beneficiary, Power of Attorney, Medical
Power of Attorney). He would have moved in with his sister.

17 4.Plaintiffs are Native American Indians who have been to
18 college and Universities exceeding associate degrees in Science
19 Technology and Medicine. Plaintiffs had a business together
20 that they ran from Detroit Michigan. Chicago, IL, California,
and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.
The killing, poisoning, hindering, blocking of plaintiffs
contact with sister and business, obstruction, Interference was
malicious and intentional, willful and wonton.

21 5.Defendants Never had Jurisdiction to place plaintiff under
22 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
23 all the family and plaintiffs; that there was court hearings or
24 to any court hearing or court action. to place plaintiff under
25 protective services was unlawful and done by NON_FAMILY MEMBERS
26 in co=conspiracy with Williamsburg social services and
27 defendant Britany Moore. under these deprival of rights and
28 lack of due process; plaintiff died and defendants basically
KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-
Jarboua's are NOT family members. The Cubans and Arabs are NOT
family members, they pretended to be plaintiff "wife" (x-wife,
plaintiff WASN'T married) and plaintiff son in Colorado
(plaintiff son in Colorado wasn't in Virginia)). Jeremy
McCallup was a married man and caused Jerry Theodore McCallup

1 Jr williamsbug house to go into foreclosure by deception. (the
 2 bills were paid, everything was taken care of,...)Plaintiff
 3 Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-
 4 \$4,900.00 and had 20 years of equity in the house. Theres no
 5 reason to lose the home except Defendant Jeremy McCallup ,
 6 Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant
 7 Jeremy McCallup was 20- 22 years old and had gotten married and
 8 wanted the house.

6.Defendants were discriminating against Plaintiff and forcing
 death upon plaintiff; because of his race, creed, nationality
 and culture. On plaintiff birth certificate and death
 certificate it documents that plaintiff is a native American,
 an Indian. Plaintiff health could be treated with diet.

7.Plaintiffs recently learned that defendants used and allowed
 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
 McCallup to pretend to be and to steal the identity of and
 aggravated identity theft, of: plaintiffs: 1. X-wife 2.
 plaintiff son; in order, to locate plaintiff money, insurance
 policies and property.

8.Plaintiff learned that defendants wanted the plaintiff Jerry
 Theodore McCallup Jr dead/to die; to collect his money, bank
 accounts, insurances, and property and to ensure death, they
 blocked tricked, would not contact, plaintiff Jerry Theodore
 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
 medical doctor and who has been treating plaintiff holistically
 until plaintiff met the Cubans/arabs (al-jarboua's).

9.Hospital records and social service records and State records
 and court records DOCUMENT; that, defendant Deborah S. Al-
 Jarboua was in continual contact with defendants and that
 defendant Brittany moore and her supervisor "Evans" and the
 James city county Williamsburg and Envoy of Williamsburg used
 the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy
 McCallup) recommendations to treat and medicate and kill
 plaintiff Jerry Theodore McCallup Jr.

10.Defendants Negligence caused another death during the same
 time frame, same location, same gender, same age group and
 under the same staff. This indicates that Defendant Scarlett
 Huag is in the morbid business and not compliance business. Two
 deaths with in a week of each other obviously indicate Envoy of
 Williamsburg is into murder.

11.All Defendants co-conspired to cause Plaintiffs death, even
 after plaintiff informed defendants he didn't take medications.

12.All Defendants Reckless and wanton conduct caused Plaintiffs
 wrongful death. All plaintiff's medical conditions could be
 treated with diet. Patients with Identical conditions are
 treated with diet ALL OVER THE WORLD.

1 13. Defendants of the Adult Protective Services division, abused
2 power and co-conspired to cause plaintiff death with (the
3 Cubans/Arabs Al-Jarboau's who are unauthorized persons
violating HIPPA LAWS.

4 14. This wrongful death complaint cause of action, civil
5 complaint has caused a. sorrow, b. mental anguish, c. loss of
6 companionship and d. business partnership.

7 15. Plaintiff seeks Compensation for reasonably expected loss
8 income from loss of business provided by the decedent.

9 16. Plaintiff seeks Expenses for the care and treatment and
10 hospitalization of the decedent resulting in death and return
11 of all expenses paid for unauthorized treatments and
12 hospitalization.

13 17. Plaintiff seeks Funeral expenses and burial expenses because
14 the cremation is in a bottle on the table.

15 18. Plaintiff seeks Punitive Damages, Plaintiff seeks
16 compensatory damages

17 19. Plaintiff Dr. Veronica McCallup DSc is Plaintiff
18 Administrator and Executor and is also Plaintiffs Beneficiary
19 and Power of attorney and Medical Power of Attorney. However,
20 was not ever contacted, called, emailed, found on facebook nor
21 any other social media in violation of due process. And seek
22 awards of all damages within this complaint.

23 20. The state last inspection on this facility was July 2018 and
24 no further check ups were made. The state found serious
25 violations at that time, that were not ever corrected. The
26 county should have been aware of these violations and should
27 never have placed the plaintiff there, nor should Jerry
28 Theodore McCallup Jr. have been placed in any hospital. His
Doctor sister could have taken him home or to a better care
facility.

21 Nor should defendants send any person to these violating
defendants for any care, hospice care or post care of any kind.
The State should care about seniors and not conspire in senior
abuse, elder abuse and violation to medicare medicade spending,
medicade.

22 The Williamsburg Judge is included as a defendant because he
23 knew all parties wasn't served/found/included. And the Judge
24 defendant is the only Judge in town and when plaintiff attempted
25 to file the wrongful death lawsuit in 2019, this Judge would
26 return the documents without filing. Plaintiff went to Virginia
27 and personally filed the lawsuit and the Judge refused to allow
28 plaintiff to file the Lawsuit. Plaintiff a 3rd time filed the
rejected lawsuit and the Judge refused to allow plaintiff to file
the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.

23 AS a Result of these defendants actions Defendant(s) Caused
the Death of Jerry Theodore McCallup Jr. and plaintiff seek

1 the said damages. Wherefore, causing plaintiffs damages,
 2 grief, undue stressors, emotional distress, fees, fines
 3 sabotaging plaintiffs statue of limitations, obstructing
 4 Justice. And plaintiff is entitled to damages demanded
 5 herein of \$3,000,000.00 PLUS Punitive damages and the courts
 6 have held that pro per litigants can receive attorney type
 7 fees for litigations/working, just like in probate matters;
 8 the administrator is paid for all hours worked on the
 9 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 10 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 11 and medical Power of Attorney documented with the military
 12 and other courts in other states including Virginia. No
 13 court, no hospital, NO action concerning Plaintiff Jerry
 14 Theodore McCallup JR. can precede without Plaintiff Dr.
 15 Veronica McCallup DSc.

16 **CLAIM XXXIII DISCRIMINATION** Damage Demand \$1,700,000.00

17 Defendants: Williamsburg Department of Human Services social
 18 services Division, Scarlett Huang (compliance officer) Envoy of
 19 Williamsburg, Department of Human Services social services
 20 Division , Scarlett Huang (compliance officer), Envoy of
 21 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 22 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 23 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup Jeremy McCallup
 24 Wife, Fahad Al-Jarboua, County of James city county, Brain L.
 25 Stevenson Jr

- 19 1. Plaintiff affirms all aforesaid and state:
- 20 2. Plaintiff records document Plaintiff as a Native American,
- 21 Indian and the prejudices to Native Americans has caused
- 22 sicknesses and death historically.
- 23 3. Wrongful Death due to a preventable medical error and the
- 24 reckless/negligent behavior of defendants.
- 25 4. Wrongful death and Patient Rights
- 26 5. Time after time after time the medical staff failed to
- 27 properly obtain medical care out side of Virginia and give
- 28 Plaintiff Jerry Theodore McCallup Jr, the best care.
6. Callous indifference to Native Americans.

7. Defendants (the Cubans/Arabs) hated Native American Indian plaintiff Jerry Theodore McCallup Jr and wanted him dead and would not seek the best recovery nor treatment for Plaintiff. Plaintiff sister is a Medical doctor living in California and Plaintiff sister could have moved Brother plaintiff Jerry Theodore McCallup to hospitals in California, Chicago, Detroit, Kansas City for better care than Envoy of Williamsburg, VA. Defendant Envoy of Williamsburg was in major State and Federal violations through 2018 and 2019 and was shut down after two (2) law suits were filed against the company. And the state is include here as a defendant because the defendant State of Virginia, never return for a compliance check after citing the defendants Violations in 2018 and thereby the compliance officer of Envoy is a defendant. Another patient of Defendant Envoy of Williamsburg died the same week that plaintiff Jerry Theodore McCallup Jr. died.

8. Thereby, Defendants causing undue suffering of Plaintiffs knee and Religious diet and even allowing plaintiff to meet with the other Natives in the area. There are 10 Tribes in the area that would have come to the facility to administer religious rights.

9. AS a Result of these defendants actions Defendant(s) Caused the Death of Jerry Theodore McCallup Jr. and plaintiff seek the said damages. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXXIV CONSPIRACY Damage Demand \$3,000,000.00

Defendants: Williamsburg Department of Human Services social services Division, Scarlett Huang (compliance officer) Envoy of Williamsburg, Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany

1 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 2 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
 3 Jeremy McCallup Wife, Fahad Al-Jarboua, County of James city
 4 county

- 5 1. Plaintiff affirms all aforesaid and state: That defendants
 6 know one another and often work together to control a person
 7 and situation according to their ideologies.
- 8 3. Plaintiff further supports the theory that plaintiff knew
 9 defendants were trying to rob him/swindle him about 2014.
 10 Plaintiff tried to separate from the Cuban/Arab defendants
 11 and plaintiff \$350,000 home entered foreclosure after owning
 12 the home and another house and properties over twenty (20)
 13 years.
- 14 4. Plaintiff believes these defendants had been poisoning
 15 plaintiff in the home; prior to any medical conditions and
 16 rush to have plaintiff cremated before plaintiff family
 17 learned of plaintiffs death. Plaintiff had enough money for
 18 burial and plaintiff family is against cremations.
- 19 5. AS a Result of these defendants actions Defendant(s) Caused
 20 the Death of Jerry Theodore McCallup Jr. and plaintiff seek
 21 the said damages. Wherefore, causing plaintiffs damages,
 22 grief, undue stressors, emotional distress, fees, fines
 23 sabotaging plaintiffs statue of limitations, obstructing
 24 Justice. And plaintiff is entitled to damages demanded
 herein of \$3,000,000.00 PLUS Punitive damages and the courts
 have held that pro per litigants can receive attorney type
 fees for litigations/working, just like in probate matters;
 the administrator is paid for all hours worked on the
 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
 Jerry Theodore McCallup JR Beneficiary and Power of attorney
 and medical Power of Attorney documented with the military
 and other courts in other states including Virginia. No
 court, no hospital, NO action concerning Plaintiff Jerry
 Theodore McCallup JR. can precede without Plaintiff Dr.
 Veronica McCallup DSc.

25 **CLAIM XXXV RICO CORRUPTION** Damage Demand **three times complaint**

26 Defendants: Williamsburg Department of Human Services social
 27 services Division , Scarlett Huang (compliance officer) Envoy of
 28 Williamsburg, Wendy Evans Williamsburg human services, Brittany

1 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
2 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
3 Jeremy McCallup Wife, Fahad Al-Jarboua Scarlett Huang (compliance
4 officer), Envoy of Williamsburg, County of James city county

5 1. Plaintiff affirms all aforesaid and state:

6 2.The Racketeer Influenced and Corrupt

7 Organizations (RICO) Act is a United States federal law that
8 provides for extended criminal penalties and a civil cause of
9 action for acts performed as part of an ongoing criminal
10 organization. The RICO Act focuses specifically
11 on racketeering and allows the leaders of a syndicate to be
12 tried for the crimes they ordered others to do or assisted them
13 in doing, closing a perceived loophole that allowed a person
14 who instructed someone else to, for example, murder, to be
15 exempt from the trial because they did not actually commit the
16 crime personally

17 3.RICO also permits a private individual "damaged in his
18 business or property" by a "racketeer" to file a civil suit.
19 The plaintiff must prove the existence of an "enterprise". The
20 defendant(s) are not the enterprise; in other words, the
21 defendant(s) and the enterprise are not one and the same. There
22 must be one of four specified relationships between the
23 defendant(s) and the enterprise: either the defendant(s)
24 invested the proceeds of the pattern of racketeering activity
25 into the enterprise (18 U.S.C. § 1962(a)); or the defendant(s)
26 acquired or maintained an interest in, or control of, the
27 enterprise through the pattern of racketeering activity
28 (subsection (b)); or the defendant(s) conducted or participated
in the affairs of the enterprise "through" the pattern of
racketeering activity (subsection (c)); or the defendant(s)
conspired to do one of the above (subsection (d)). In essence,

- 1 the enterprise is either the 'prize,' 'instrument,' 'victim,'
 2 or 'perpetrator' of the racketeers.
- 3 6. Defendants Deborah Al-Jarboau (the Cubans/Arabs) hated
 4 Native American Indian plaintiff Jerry Theodore McCallup Jr
 5 and wanted him dead and would not seek the best recovery nor
 6 treatment for Plaintiff.
- 7 7. Defendant Deborah Al-Jarboua sought men to pay her and her
 8 Cuban family way in America and finance her and Cuban family
 9 in America.
- 10 8. Defendant Deborah Al-Jarboua is "SERIAL"; like a serial
 11 killer. Men run from her when they figure her out, Her mode
 12 of action is: foreign men/ Native American men. She cries
 13 wolf. They feel sorry for her, she moves in. She gets
 14 pregnant. She attempts to kill them/mame them/ incapacitate
 15 them/poison them/put "something in their food".
- 16 9. Defendant Deborah Al-Jarboua enterprise consisted of
 17 marrying these non-american men and living with these men.
 18 First was the arab guy "al-jarboua" who she had a child by.
 19 When he determined that she was for money , he took the
 20 child (defendant Fahad Al-jarboua) and he left the
 21 country/America with the child.
- 22 10. Some how defendant Deborah Al-Jarboua was able to use a
 23 Cuban santerian spell on Plaintiff Jerry Theodore McCallup
 24 JR and suckered him into Going to Arabia and retrieving
 25 defendant Fahad Al-Jarboua. Plaintiff Jerry Theodore
 26 McCallup JR begain having medical problems after that.
- 27 11. Plaintiff Dr. Veronica McCallup DSC began treating
 28 plaintiff Jerry Theodore McCallup JR and he distanced
 himself from the Cuban woman defendant Deborah Al-Jarboua.
12. Plaintiff sister is a Medical doctor living in
 California and Plaintiff sister could have moved Brother
 plaintiff Jerry Theodore McCallup to hospitals in
 California, Chicago, Detroit, Kansas City for better care
 than Envoy of Williamsburg, VA.
13. Defendant Envoy of Williamsburg was in major State and
 Federal violations through 2018 and 2019 and was shut down
 after two (2) law suits were filed against the company. And
 the state is include here as a defendant because the
 defendant State of Virginia, never return for a compliance
 check after citing the defendants Violations in 2018 and
 thereby the compliance officer of Envoy is a defendant.
 Another patient of Defendant Envoy of Williamsburg died the
 same week that plaintiff Jerry Theodore McCallup Jr. died.
14. Defendants Brittany Moore, the Williamsburg human
 services and the city of Williamsburg and county of James

1 county Virginia obviously had to agree to obtain a court
 2 order without plaintiff's power of attorney and medical
 3 power of attorney.

4 15. Defendants Brittany Moore and the Williamsburg human
 5 services and the city of Williamsburg and county of James
 6 County Virginia obviously had to co-conspire with the
 7 hospitals involved, to place plaintiff in their facilities
 8 and thereafter, placed into ENVOY of Williamsburg who should
 9 have been shut down by the state of Virginia for all the
 10 serious violations, determined by the state of Virginia. So
 11 knowingly, these defendants are endangering seniors,
 12 plaintiff that has resulted in death. Wrongful Death This
 13 Civil action and Complaint is for damages sustained by
 14 plaintiff(s) for the malicious and intentional actions and
 15 wrongful death caused by defendants, they have cause the
 16 wrongful death of plaintiff using trickery, theft of
 17 identification, deprivation of medical care . VA 8.01 -50 VA
 18 8.01 - 244 1977 c.617, 1958 c 470, 1981 c 115, 2012 c 725
 19 Shepard v. Capitol Foundry of Va., 262 Va. 715, 718-719 (Va.
 20 2001)

21 16. Deprivation of Medical Care and medical care in another
 22 State

23 17. Defendants Administered contraindicated medicines to
 24 plaintiff Jerry Theodore McCallup Jr, that caused him
 25 seizures and brain injury , Renal Failure, and death;
 26 against plaintiffs continual complaints that those medicines
 27 being contraindicative to him. This is proven by the
 28 defendants illegally having to forcibly get an illegal court
 order and forcibly administer contraindicative drugs before
 and after February 2019 and defendants continually forcing
 medicines on Plaintiff through and including February 2019
 until about March 2, 2019 when plaintiff died from the prior
 times of forced drugging. Plaintiff is a retired military
 vet that didn't have any medical problems that would cause
 death. The defendant had been an athlete all his life and
 father was a professional athlete and sister an athlete.
 Athletics and health conscience is a family trait.

18. AS a Result of these defendants actions Defendant(s)
 Caused the Death of Jerry Theodore McCallup Jr. and
 plaintiff seek the said damages. Wherefore, causing
 plaintiffs damages, grief, undue stressors, emotional
 distress, fees, fines sabotaging plaintiffs statue of
 limitations, obstructing Justice. And plaintiff is entitled
 to damages demanded herein of \$3,000,000.00 PLUS Punitive
 damages and the courts have held that pro per litigants can
 receive attorney type fees for litigations/working, just

1 like in probate matters; the administrator is paid for all
 2 hours worked on the estate. Plaintiff Dr Veronica McCallup
 3 DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary
 4 and Power of attorney and medical Power of Attorney
 5 documented with the military and other courts in other
 6 states including Virginia. No court, no hospital, NO action
 7 concerning Plaintiff Jerry Theodore McCallup JR. can precede
 8 without Plaintiff Dr. Veronica McCallup DSc.

9 **CLAIM XXXVI LOSS OF INCOME** Damage Demand \$13,000,000.00

10 Defendants: Williamsburg Department of Human Services social
 11 services Division, Scarlett Huang (compliance officer) Envoy of
 12 Williamsburg, Department of Human Services social services
 13 Division , Scarlett Huang (compliance officer) Envoy of
 14 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 15 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 16 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
 17 Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city
 18 county

19 1. Plaintiff affirms all aforesaid and state:

20 2. That Plaintiff and his Sister; Dr. Veronica McCallup DSc ran
 21 a business together called CTI Chemicals and Allied Products,
 22 Inc out of Chicago Il and CTI, Inc out of Detroit Michigan.

23 3. Plaintiff was in contact with military friends and family
 24 members in many fields and locations, they would send
 25 perspective contracts to plaintiff who would evaluate them and

26 His sister would create the plan to fulfill the contracts.

27 4. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
 28 sister, Dr. Veronica McCallup DSc and defendants refused to
 locate plaintiff. (Beneficiary, Power of Attorney, Medical
 Power of Attorney). He would have moved in with his sister.

5. Plaintiffs are Native American Indians who have been to
 college and Universities exceeding associate degrees in Science
 Technology and Medicine. Plaintiffs had a business together
 that they ran from Detroit Michigan. Chicago, IL, California,
 and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.
 The killing, poisoning, hindering, blocking of plaintiffs

1 contact with sister and business, obstruction, Interference was
2 malicious and intentional, willful and wonton.

3 6.Defendants Never had Jurisdiction to place plaintiff under
4 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
5 all the family and plaintiffs; that there was court hearings or
6 to any court hearing or court action. to place plaintiff under
7 protective services was unlawful and done by NON_FAMILY MEMBERS
8 in co=conspiracy with Williamsburg social services and
9 defendant Brittany Moore. under these deprival of rights and
10 lack of due process; plaintiff died and defendants basically
11 KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-
12 Jarboua's are NOT family members. The Cubans and Arabs are NOT
13 family members, they pretended to be plaintiff "wife" (x-wife,
14 plaintiff WASN'T married) and plaintiff son in Colorado
15 (plaintiff son in Colorado wasn't in Virginia)). Jeremy
16 McCallup was a married man and caused Jerry Theodore McCallup
17 Jr williamsbug house to go into forclosure by deception. (the
18 bills were paid, everything was taken care of,...)Plaintiff
19 Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-
20 \$4,900.00 and had 20 years of equity in the house. Theres no
21 reason to lose the home except Defendant Jeremy McCallup ,
22 Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant
23 Jeremy McCallup was 20- 22 years old and had gotten married and
24 wanted the house.

25 6.Defendants were discriminating against Plaintiff and forcing
26 death upon plaintiff; because of his race, creed, nationality
27 and culture. On plaintiff birth certificate and death
28 certificate it documents that plaintiff is a native American,
an Indian. Plaintiff health could be treated with diet.

7.Plaintiffs recently learned that defendants used and allowed
defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
McCallup to pretend to be and to steal the identity of and
aggravated identity theft, of: plaintiffs: 1. X-wife 2.
plaintiff son; in order, to locate plaintiff money, insurance
policies and property.

8.Plaintiff learned that defendants wanted the plaintiff Jerry
Theodore McCallup Jr dead/to die; to collect his money, bank
accounts, insurances, and property and to ensure death, they
blocked tricked, would not contact, plaintiff Jerry Theodore
McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
medical doctor and who has been treating plaintiff holistically
until plaintiff met the Cubans/arabs (al-jarboua's).

9.Hospital records and social service records and State records
and court records DOCUMENT; that, defendant Deborah S. Al-
Jarboua was in continual contact with defendants and that
defendant Brittany moore and her supervisor "Evans" and the
James city county Williamsburg and Envoy of Williamsburg used

1 the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy
2 McCallup) recommendations to treat and medicate and kill
3 plaintiff Jerry Theodore McCallup Jr.

4 10. Defendants Negligence caused another death during the same
5 time frame, same location, same gender, same age group and
6 under the same staff. This indicates that Defendant Scarlett
7 Huag is in the morbid business and not compliance business. Two
8 deaths with in a week of each other obviously indicate Envoy of
9 Williamsburg is into murder.

10 11. All Defendants co-conspired to cause Plaintiffs death, even
11 after plaintiff informed defendants he didn't take medications.

12 12. All Defendants Reckless and wanton conduct caused Plaintiffs
13 wrongful death. All plaintiff's medical conditions could be
14 treated with diet. Patients with Identical conditions are
15 treated with diet ALL OVER THE WORLD.

16 13. Defendants of the Adult Protective Services division, abused
17 power and co-conspired to cause plaintiff death with (the
18 Cubans/Arabs Al-Jarboau's who are unauthorized persons
19 violating HIPPA LAWS.

20 14. This wrongful death complaint cause of action, civil
21 complaint has caused a. sorrow, b. mental anguish, c. loss of
22 companionship and d. business partnership.

23 15. Plaintiff seeks Compensation for reasonably expected loss
24 income from loss of business provided by the decedent.

25 16. Plaintiff seeks Expenses for the care and treatment and
26 hospitalization of the decedent resulting in death and return
27 of all expenses paid for unauthorized treatments and
28 hospitalization.

17 17. Plaintiff seeks Funeral expenses and burial expenses because
18 the cremation is in a bottle on the table.

19 18. Plaintiff seeks Punitive Damages

20 19. Plaintiff seeks compensatory damages

21 20. Dr. Veronica McCallup DSc is Plaintiff Administrator and
22 Executor and is also Plaintiffs Beneficiary and Power of
23 attorney and Medical Power of Attorney. However, was not ever
24 contacted, called, emailed, found on facebook nor any other
25 social media in violation of due process. And seek awards of
26 all damages within this complaint.

27 21. The state last inspection on this facility was July 2018 and
28 no further check ups were made. The state found serious
violations at that time, that were not ever corrected. The
county should have been aware of these violations and should
never have placed the plaintiff there, nor should Jerry
Theodore McCallup Jr. have been placed in any hospital. His
Doctor sister could have taken him home or to a better care
facility.

1 22. Nor should defendants send any person to these violating
 2 defendants for any care, hospice care or post care of any kind.
 3 The State should care about seniors and not conspire in senior
 4 abuse, elder abuse and violation to medicare medicade spending,
 5 medicade.

6 23. The Williamsburg Judge is included as a defendant because he
 7 knew all parties wasn't served/found/included. And the Judge
 8 defendant is the only Judge in town and when plaintiff
 9 attempted to file the wrongful death lawsuit in 2019, this
 10 Judge would return the documents without filing. Plaintiff went
 11 to Virginia and personally filed the lawsuit and the Judge
 12 refused to allow plaintiff to file the Lawsuit. Plaintiff a 3rd
 13 time filed the rejected lawsuit and the Judge refused to allow
 14 plaintiff to file the lawsuit and WOULDN'T tell plaintiff why
 15 after 3-4 times.

16 24. AS a Result of these defendants actions Defendant(s) Caused
 17 loss of contracts by and through the Death of Jerry Theodore
 18 McCallup Jr. and plaintiff seek the said damages. Wherefore,
 19 causing plaintiffs damages, grief, undue stressors, emotional
 20 distress, fees, fines sabotaging plaintiffs statue of
 21 limitations, obstructing Justice. And plaintiff is entitled to
 22 damages demanded herein of \$3,000,000.00 PLUS Punitive damages
 23 and the courts have held that pro per litigants can receive
 24 attorney type fees for litigations/working, just like in probate
 25 matters; the administrator is paid for all hours worked on the
 26 estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry
 27 Theodore McCallup JR Beneficiary and Power of attorney and
 28 medical Power of Attorney documented with the military and other
 courts in other states including Virginia. No court, no hospital,
 NO action concerning Plaintiff Jerry Theodore McCallup JR. can
 precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXXVII VIOLATION OF RELIGIOUS PRACTICES Damage Demand

\$3,000,000.00

Defendants: Williamsburg Department of Human Services social
 services Division, Scarlett Huang (compliance officer), Envoy of
 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup, County of
 James city county, Jeremy McCallup Wife, Fahad Al-Jarboua,

1 1. Plaintiff affirms all aforesaid and state: Defendants knew
2 from medical records that Plaintiff was a native Indian and
3 required religious freedoms and dietary rights.

4 2.The depriving plaintiff the right to refuse a pill is denying
5 rights.

6 3.Plaintiff further supports the theory that plaintiff knew
7 defendants were trying to rob him/swindle him about 2014.
8 Plaintiff tried to separate from the Cuban/Arab defendants and
9 plaintiff \$350,000 home entered foreclosure after owning the
10 home and another house and properties over twenty (20) years.

11 4.Plaintiff believes these defendants had been poisoning
12 plaintiff in the home; prior to any medical conditions and rush
13 to have plaintiff cremated before plaintiff family learned of
14 plaintiffs death. Plaintiff had enough money for burial and
15 plaintiff family is against cremations.

16 5.To create a court case by the city of Williamsburg and James
17 city count to kidnap Plaintiff because he exercised his rights
18 to refuse contra-indicated medicine is cruel and unusual
19 punishment, its harsh and malicious bullying to show control by
20 Brittany and her abuse of power and manipulation of the system
21 to have power over plaintiff. Most women like Plaintiff and
22 Brittany moore may have been upset that plaintiff refused her
23 advances.

24 6.Plaintiff received 3 checks per month thereby he was a good
25 catch for ENVOY of Williamsburg hospitals and girls and the
26 reason the Al-Jarboua's wanted his money and him dead to
27 collect his savings , insurances and properties

28 7. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
sister, Dr. Veronica McCallup DSc and defendants refused to
locate plaintiff. (Beneficiary, Power of Attorney, Medical
Power of Attorney). He would have moved in with his sister.

8.Plaintiffs are Native American Indians who have been to
college and Universities exceeding associate degrees in Science
Technology and Medicine. Plaintiffs had a business together
that they ran from Detroit Michigan. Chicago, IL, California,
and Texas. Plaintiff CTI Chemicals and Allied Products, Inc.
The killing, poisoning, hindering, blocking of plaintiffs
contact with sister and business, obstruction, Interference was
malicious and intentional, willful and wonton.

1 9. Defendants Never had Jurisdiction to place plaintiff under
 2 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
 3 all the family and plaintiffs; that there was court hearings or
 4 to any court hearing or court action. to place plaintiff under
 5 protective services was unlawful and done by NON_FAMILY MEMBERS
 6 in co-conspiracy with Williamsburg social services and
 7 defendant Brittany Moore. under these deprival of rights and
 8 lack of due process; plaintiff died and defendants basically
 9 KIDNAPPED plaintiff and forced death upon Plaintiff. The (Al-
 10 Jarboua's are NOT family members. The Cubans and Arabs are NOT
 11 family members, they pretended to be plaintiff "wife" (x-wife,
 12 plaintiff WASN'T married) and plaintiff son in Colorado
 13 (plaintiff son in Colorado wasn't in Virginia)). Jeremy
 14 McCallup was a married man and caused Jerry Theodore McCallup
 15 Jr williamsbug house to go into forclosure by deception. (the
 16 bills were paid, everything was taken care of,...) Plaintiff
 17 Jerry Theodore McCallup Jr had a monthly income of \$3,400.00-
 18 \$4,900.00 and had 20 years of equity in the house. Theres no
 19 reason to lose the home except Defendant Jeremy McCallup ,
 20 Fahad Al-jarboua and Deborah Al-jarboua scheme. Defendant
 21 Jeremy McCallup was 20- 22 years old and had gotten married and
 22 wanted the house.

10. Defendants were discriminating against Plaintiff and forcing
 death upon plaintiff; because of his race, creed, nationality
 and culture. On plaintiff birth certificate and death
 certificate it documents that plaintiff is a native American,
 an Indian. Plaintiff health could be treated with diet.

11. Plaintiffs recently learned that defendants used and allowed
 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
 McCallup to pretend to be and to steal the identity of and
 aggravated identity theft, of: plaintiffs: 1. X-wife 2.
 plaintiff son; in order, to locate plaintiff money, insurance
 policies and property.

12. Plaintiff learned that defendants wanted the plaintiff Jerry
 Theodore McCallup Jr dead/to die; to collect his money, bank
 accounts, insurances, and property and to ensure death, they
 blocked tricked, would not contact, plaintiff Jerry Theodore
 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
 medical doctor and who has been treating plaintiff holistically
 until plaintiff met the Cubans/arabs (al-jarboua's).

13. Hospital records and social service records and State
 records and court records DOCUMENT; that, defendant Deborah S.
 Al-Jarboua was in continual contact with defendants and that
 defendant Brittany moore and her supervisor "Evans" and the
 James city county Williamsburg and Envoy of Williamsburg used
 the 3 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy

1 McCallup) recommendations to treat and medicate and kill
2 plaintiff Jerry Theodore McCallup Jr.

3 14. Defendants Negligence caused another death during the same
4 time frame, same location, same gender, same age group and
5 under the same staff. This indicates that Defendant Scarlett
6 Huag is in the morbid business and not compliance business. Two
7 deaths with in a week of each other obviously indicate Envoy of
8 Williamsburg is into murder.

9 15. All Defendants co-conspired to cause Plaintiffs death, even
10 after plaintiff informed defendants he didn't take medications.

11 16. All Defendants Reckless and wanton conduct caused Plaintiffs
12 wrongful death. All plaintiff's medical conditions could be
13 treated with diet. Patients with Identical conditions are
14 treated with diet ALL OVER THE WORLD.

15 17. Defendants of the Adult Protective Services division, abused
16 power and co-conspired to cause plaintiff death with (the
17 Cubans/Arabs Al-Jarboau's who are unauthorized persons
18 violating HIPPA LAWS.

19 18. This wrongful death complaint cause of action, civil
20 complaint has caused a. sorrow, b. mental anguish, c. loss of
21 companionship and d. business partnership.

22 19. Plaintiff seeks Compensation for reasonably expected loss
23 income from loss of business provided by the decedent.

24 20. Plaintiff seeks Expenses for the care and treatment and
25 hospitalization of the decedent resulting in death and return
26 of all expenses paid for unauthorized treatments and
27 hospitalization.

28 21. Plaintiff seeks Funeral expenses and burial expenses because
the cremation is in a bottle on the table.

22. Plaintiff seeks Punitive Damages, Plaintiff seeks
compensatory damages

23. Dr. Veronica McCallup DSc is Plaintiff Administrator and
Executor and is also Plaintiffs Beneficiary and Power of
attorney and Medical Power of Attorney. However, was not ever
contacted, called, emailed, found on facebook nor any other
social media in violation of due process. And seek awards of
all damages within this complaint.

24. The state last inspection on this facility was July 2018 and
no further check ups were made. The state found serious
violations at that time, that were not ever corrected. The
county should have been aware of these violations and should
never have placed the plaintiff there, nor should Jerry
Theodore McCallup Jr. have been placed in any hospital. His
Doctor sister could have taken him home or to a better care
facility.

25. Nor should defendants send any person to these violating
defendants for any care, hospice care or post care of any kind.

1 The State should care about seniors and not conspire in senior
2 abuse, elder abuse and violation to medicare medicade spending,
3 medicade.

4 26.The Williamsburg Judge is included as a defendant because he
5 knew all parties wasn't served/found/included. And the Judge
6 defendant is the only Judge in town and when plaintiff
7 attempted to file the wrongful death lawsuit in 2019, this
8 Judge would return the documents without filing. Plaintiff went
9 to Virginia and personally filed the lawsuit and the Judge
10 refused to allow plaintiff to file the Lawsuit. Plaintiff a 3rd
11 time filed the rejected lawsuit and the Judge refused to allow
12 plaintiff to file the lawsuit and WOULDN'T tell plaintiff why
13 after 3-4 times.

14 27.AS a Result of these defendants actions Defendant(s) Caused
15 the Death of Jerry Theodore McCallup Jr. and plaintiff seek the
16 said damages. Wherefore, causing plaintiffs damages, grief, undue
17 stressors, emotional distress, fees, fines sabotaging plaintiffs
18 statue of limitations, obstructing Justice. And plaintiff is
19 entitled to damages demanded herein of \$3,000,000.00 PLUS
20 Punitive damages and the courts have held that pro per litigants
21 can receive attorney type fees for litigations/working, just like
22 in probate matters; the administrator is paid for all hours
23 worked on the estate.Plaintiff Dr Veronica McCallup DSc is
24 Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of
25 attorney and medical Power of Attorney documented with the
26 military and other courts in other states including Virginia. No
27 court, no hospital, NO action concerning Plaintiff Jerry Theodore
28 McCallup JR. can precede without Plaintiff Dr. Veronica McCallup
DSc.

19 **CLAIM XXXVIII Wrongful death and survival statute 42 U.S. Code §**

20 **1996 - Protection and preservation.** the policy of the United
21 States to protect and preserve for American Indians their
22 inherent right of freedom to believe, express, and exercise the
23 traditional religions of the American Indian, Eskimo, Aleut,
24 and Native Hawaiians, including but not limited to access to
25 sites, use and possession of sacred objects, and the freedom to
26 worship through ceremonials and traditional rites.

26 Damage Demand \$5,000,000.00

27 Defendants: Williamsburg Department of Human Services social
28 services Division, Scarlett Huang (compliance officer) Envoy of
Williamsburg, Department of Human Services social services

1 Division , Scarlett Huang (compliance officer) Envoy of
 2 Williamsburg, Wendy Evans Williamsburg human services, Brittany
 3 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
 4 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
 5 Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city
 6 county

7 1. Plaintiff re-affirms all the aforesaid herein and state: That
 8 plaintiff Jerry Theodore McCallup JR death certificate is not
 9 signed by a doctor. It doesn't state the cause of death and the
 10 only information on the death certificate is from a slow mentally
 11 incapacitated child. So the cause of death is unknown. That's how
 12 defendants cover up their recklessness, abuse and negligence.

13 2. Defendants (the Cubans/Arabs) hated Native American Indian
 14 plaintiff Jerry Theodore McCallup Jr and wanted him dead and
 15 would not seek the best recovery nor treatment for Plaintiff.
 16 Plaintiff sister is a Medical doctor living in California and
 17 Plaintiff sister could have moved Brother plaintiff Jerry
 18 Theodore McCallup to hospitals in California, Chicago, Detroit,
 19 Kansas City for better care than Envoy of Williamsburg, VA.
 20 Defendant Envoy of Williamsburg was in major State and Federal
 21 violations through 2018 and 2019 and was shut down after two (2)
 22 law suits were filed against the company. And the state is
 23 include here as a defendant because the defendant State of
 24 Virginia, never return for a compliance check after citing the
 25 defendants Violations in 2018 and thereby the compliance officer
 26 of Envoy is a defendant. Another patient of Defendant Envoy of
 27 Williamsburg died the same week that plaintiff Jerry Theodore
 28 McCallup Jr. died.

3. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
 sister, Dr. Veronica McCallup DSc and defendants refused to
 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power
 of Attorney). He would have moved in with his sister.

4. Plaintiffs are Native American Indians who have been to college
 and Universities exceeding associate degrees in Science
 Technology and Medicine. Plaintiffs had a business together that
 they ran from Detroit Michigan. Chicago, IL, California, and
 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The
 killing, poisoning, hindering, blocking of plaintiffs contact
 with sister and business, obstruction, Interference was malicious
 and intentional, willful and wonton.

1 5. Defendants Never had Jurisdiction to place plaintiff under
 2 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
 3 all the family and plaintiffs; that there was court hearings or
 4 to any court hearing or court action. to place plaintiff under
 5 protective services was unlawful and done by NON_FAMILY MEMBERS
 6 in co-conspiracy with Williamsburg social services and defendant
 7 Britany Moore. under these deprivation of rights and lack of due
 8 process; plaintiff died and defendants basically KIDNAPPED
 9 plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are
 10 NOT family members. The Cubans and Arabs are NOT family members,
 11 they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T
 12 married) and plaintiff son in Colorado (plaintiff son in Colorado
 13 wasn't in Virginia)). Jeremy McCallup was a married man and
 14 caused Jerry Theodore McCallup Jr Williamsburg house to go into
 15 foreclosure by deception. (the bills were paid, everything was
 16 taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a
 17 monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity
 18 in the house. There's no reason to lose the home except Defendant
 19 Jeremy McCallup, Fahad Al-jarboua and Deborah Al-jarboua scheme.
 20 Defendant Jeremy McCallup was 20- 22 years old and had gotten
 21 married and wanted the house.

22 6. Defendants were discriminating against Plaintiff and forcing
 23 death upon plaintiff; because of his race, creed, nationality and
 24 culture. On plaintiff birth certificate and death certificate it
 25 documents that plaintiff is a native American, an Indian.
 26 Plaintiff health could be treated with diet.

27 7. Plaintiffs recently learned that defendants used and allowed
 28 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
 29 McCallup to pretend to be and to steal the identity of and
 30 aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff
 31 son; in order, to locate plaintiff money, insurance policies and
 32 property.

33 8. Plaintiff learned that defendants wanted the plaintiff Jerry
 34 Theodore McCallup Jr dead/to die; to collect his money, bank
 35 accounts, insurances, and property and to ensure death, they
 36 blocked tricked, would not contact, plaintiff Jerry Theodore
 37 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
 38 medical doctor and who has been treating plaintiff holistically
 39 until plaintiff met the Cubans/arabs (al-jarboua's).

40 9. Hospital records and social service records and State records
 41 and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua
 42 was in continual contact with defendants and that defendant
 43 Brittany moore and her supervisor "Evans" and the James city
 44 county Williamsburg and Envoy of Williamsburg used the 3
 45 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy
 46 McCallup) recommendations to treat and medicate and kill
 47 plaintiff Jerry Theodore McCallup Jr.

1 10. Defendants Negligence caused another death during the same
2 time frame, same location, same gender, same age group and under
3 the same staff. This indicates that Defendant Scarlett Huag is in
4 the morbid business and not compliance business. Two deaths with
in a week of each other obviously indicate Envoy of Williamsburg
is into murder.

5 11. All Defendants co-conspired to cause Plaintiffs death, even
after plaintiff informed defendants he didn't take medications.

6 12. All Defendants Reckless and wanton conduct caused Plaintiffs
wrongful death. All plaintiff's medical conditions could be
7 treated with diet. Patients with Identical conditions are treated
with diet ALL OVER THE WORLD.

8 13. Defendants of the Adult Protective Services division, abused
9 power and co-conspired to cause plaintiff death with (the
Cubans/Arabs Al-Jarboau's who are unauthorized persons violating
10 HIPPA LAWS.

11 14. This wrongful death complaint cause of action, civil complaint
has caused a. sorrow, b. mental anguish, c. loss of companionship
12 and d. business partnership.

13 15. Plaintiff seeks Compensation for reasonably expected loss
income from loss of business provided by the decedent.

14 16. Plaintiff seeks Expenses for the care and treatment and
hospitalization of the decedent resulting in death and return of
15 all expenses paid for unauthorized treatments and
hospitalization.

16 17. Plaintiff seeks Funeral expenses and burial expenses because
the cremation is in a bottle on the table. Plaintiff seeks
17 Punitive Damages, Plaintiff seeks compensatory damages

18 18. Dr. Veronica McCallup DSc is Plaintiff Administrator and
Executor and is also Plaintiffs Beneficiary and Power of attorney
19 and Medical Power of Attorney. However, was not ever contacted,
called, emailed, found on facebook nor any other social media in
20 violation of due process. And seek awards of all damages within
this complaint.

21 19. The state last inspection on this facility was July 2018 and
22 no further check ups were made. The state found serious
violations at that time, that were not ever corrected. The county
23 should have been aware of these violations and should never have
placed the plaintiff there, nor should Jerry Theodore McCallup
24 Jr. have been placed in any hospital. His Doctor sister could
25 have taken him home or to a better care facility.

26 20. Nor should defendants send any person to these violating
defendants for any care, hospice care or post care of any kind.
27 The State should care about seniors and not conspire in senior
abuse, elder abuse and violation to medicare medicade spending,
28 medicade.

21. The Williamsburg Judge is included as a defendant because he knew all parties wasn't served/found/included. And the Judge defendant is the only Judge in town and when plaintiff attempted to file the wrongful death lawsuit in 2019, this Judge would return the documents without filing. Plaintiff went to Virginia and personally filed the lawsuit and the Judge refused to allow plaintiff to file the Lawsuit. Plaintiff a 3rd time filed the rejected lawsuit and the Judge refused to allow plaintiff to file the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.

22. Wherefore, causing plaintiffs damages, grief, undue stressors, emotional distress, fees, fines sabotaging plaintiffs statue of limitations, obstructing Justice. And plaintiff is entitled to damages demanded herein of \$3,000,000.00 PLUS Punitive damages and the courts have held that pro per litigants can receive attorney type fees for litigations/working, just like in probate matters; the administrator is paid for all hours worked on the estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

CLAIM XXXIX OBSTRUCTION OF EVIDENCE, DEPRIVING EVIDENCE,

DESTROYING EVIDENCE Damage Demand \$5,000,000.00

Defendants: Williamsburg Department of Human Services social services Division, Scarlett Huang (compliance officer) Envoy of Williamsburg, Department of Human Services social services Division , Scarlett Huang (compliance officer) Envoy of Williamsburg, Wendy Evans Williamsburg human services, Brittany Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore McCallup III, Deborah Al-Jarboua, Jeremy Mccallup
Jeremy McCallup Wife, Fahad Al-Jarboua , County of James city county

1. Plaintiff affirms all aforesaid and state:

2. Defendant Jeremy Mccallup hid Plaintiff Jerry Mccallup Jr in motels when Plaintiff had enough money to maintain the Virginia house and or the apartment at Merrimac crossing.

1 3. Defendant Jeremy McCallup and Deborah Al-Jarboua and Fahad
2 Al-Jarboua wanted the plaintiff Jerry Theodore McCallup Jr
3 money and told defendant Williamsburg Human services that
4 Plaintiff Jerry Theodore McCallup JR was going to pay him
5 \$1,500.00 a month. There was NO WAY Plaintiff Jerry Theodore
6 McCallup JR was going to pay Defendant Jeremy McCallup
7 \$1,500.00 before Defendant Jerry Theodore McCallup III. But
8 Defendant Jeremy McCallup Had intentionally incapacitated
9 plaintiff Jerry Theodore McCallup JR and blocked any and all
10 abilities for Dr. Veronica McCallup DSc and defendant Jerry
11 Theodore McCallup III from reaching Plaintiff Jerry Theodore
12 McCallup JR.

13 4. Plaintiff has requested records and medical records
14 treatments and hospitalizations from defendants since May 2019
15 and defendants have refused Plaintiffs estate.

16 5. Plaintiff estate traveled to defendants in persons and
17 defendants assure plaintiff that; the records would be
18 collected and forwarded to plaintiff. However, defendant
19 "Ciere" places plaintiff estate on indefinite holds on the
20 phone and run-a-rounds, not connecting to defendant Brian
21 Stevenson, who stood in the hall way looking and listening to
22 plaintiffs estate and knew the request for records and
23 documents, had been faxed and personally delivered, but, he
24 continues to ignore plaintiffs, like he has ignore the ENVOY of
25 Williamsburg and has the facility in major state violations.
26 And like, he is part cause, of another death, of another man;
27 at the ENVOY of Williamsburg VA for ignoring/negligence he is a
28 responsible party in this death of this plaintiff.

6. Plaintiffs', Facebook messaged and actually wrote on
defendants facebook page; requesting information about brothers
death; and all defendants BLOCKED plaintiffs on all social
media. Even Mikala McCallup Blocked Plaintiffs on all social
media pages.

1 7. Plaintiffs contacted Fort Braggs Military base where
2 defendant Fahad Al-Jarboua is a recruiting sergeant in North
3 Carolina. Plaintiff explain that Plaintiff had died and that
4 Defendant Fahad Al-Jarboua was coming to Envoy acting like the
5 son and prescribing medication and approving medical treatments
6 in uniform. This mis-leading act is illegal and actionable.
7 Fort Briggs said they would reach out to the soldier and they
8 did, defendant Fahad Al-Jarboua had someone call plaintiff from
9 a north Carolina number. Plaintiff explained that "my brother
10 died, I'm just finding out. can you tell me what happened. "and
11 the party from North Carolina said : "you have the wrong
12 number". Fort Braggs gave them my number after they looked up
13 the soldier name rank serial number. It wasn't the wrong
14 number. He's their soldier.

15 8. AS a Result of these defendants actions they Caused the
16 Death of Jerry Theodore McCallup Jr. and injured plaintiffs,
17 and thereby plaintiffs seek all the aforesaid damages.

18 9. Plaintiffs are also seeking court marshal of soldiers
19 involved and imprisonment of drug administrators cops
20 doctors nurses Deborah Al-jarboua and all others involve at
21 social services "Evans and Britany Moore and the Judge
22 removed from all cases/ retired.

23 10. Wherefore, causing plaintiffs damages, grief, undue
24 stressors, emotional distress, fees, fines sabotaging
25 plaintiffs statue of limitations, obstructing Justice. And
26 plaintiff is entitled to damages demanded herein of
27 \$3,000,000.00 PLUS Punitive damages and the courts have held
28 that pro per litigants can receive attorney type fees for
litigations/working, just like in probate matters; the
administrator is paid for all hours worked on the
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's
Jerry Theodore McCallup JR Beneficiary and Power of attorney
and medical Power of Attorney documented with the military
and other courts in other states including Virginia. No
court, no hospital, NO action concerning Plaintiff Jerry
Theodore McCallup JR. can precede without Plaintiff Dr.
Veronica McCallup DSc.

1
2 **CLAIM XXXVI DEPRIVAL OF MEDICAL CARE.** 3 million dollars is
3 DEMANDED .

4 Defendants: Williamsburg Department of Human Services social
5 services Division Scarlett Huang (compliance officer), Envoy of
6 Williamsburg, Department of Human Services social services
7 Division , Scarlett Huang (compliance officer) Envoy of
8 Williamsburg, Wendy Evans Williamsburg human services, Brittany
9 Moore, Consulate Heath Care, Sentara Health Care, Jerry Theodore
10 McCallup III, Deborah Al-Jarboua, Jeremy Mccallup

11 Jeremy McCallup Wife, Fahad Al-Jarboua , James City County

12 1. Plaintiff re-affirms all the aforesaid herein and state:

13 2. Plaintiff's sister is a doctor and the sister could have taken
14 plaintiff with sister to be medically treated in another state.

15 Plaintiff is also Native Indian and there are 10 tribes in the
16 surrounding Virginia area, with medicine men, but none was

17 contacted. Plaintiff sister called all the tribes and spoke to
18 the chiefs. It was obvious that Envoy of Williamsburg COULDN'T

19 care for plaintiff and no-other person because one died in the
20 same week of plaintiff and in September 2019 all patients were

21 removed. Even after covid 19 onset and Envoy of williamsburg
22 reopening, the defendants fail to give plaintiff due process and

rights.

23 3.Many doctors prescribe rehab for patients. Ive seen severe head
24 injuries and paraplegic. Defendants offered no rehab, they
25 offered no alternatives, they didn't even contact doctor
26 relatives.

27 4.Wrongful Death due to a preventable medical error and the
reckless/negligent behavior of defendants.

28 5.Wrongful death and Patient Rights

1 6. Time after time after time the medical staff failed to properly
2 obtain medical care out side of Virginia and give Plaintiff Jerry
3 Theodore McCallup Jr, the best care.

4 7. Callous indifference to Native Americans.

5 On or about February and April and May of 2020 Plaintiff
6 personally walked into Envoy of Williamsburg and requested
7 records and documents. This is September 7, 2020 and Plaintiff
8 hasn't received them to date. I declare under penalty of
9 perjury this is true and correct.

10 8. Plaintiff Jerry Theodore McCallup Jr repeatedly requested
11 sister, Dr. Veronica McCallup DSc and defendants refused to
12 locate plaintiff. (Beneficiary, Power of Attorney, Medical Power
13 of Attorney). He would have moved in with his sister.

14 9. Plaintiffs are Native American Indians who have been to college
15 and Universities exceeding associate degrees in Science
16 Technology and Medicine. Plaintiffs had a business together that
17 they ran from Detroit Michigan. Chicago, IL, California, and
18 Texas. Plaintiff CTI Chemicals and Allied Products, Inc. The
19 killing, poisoning, hindering, blocking of plaintiffs contact
20 with sister and business, obstruction, Interference was malicious
21 and intentional, willful and wonton.

22 10. Defendants Never had Jurisdiction to place plaintiff under
23 ADULT PROTECTIVE SERVICES, and defendants never gave notice to
24 all the family and plaintiffs; that there was court hearings or
25 to any court hearing or court action. to place plaintiff under
26 protective services was unlawful and done by NON_FAMILY MEMBERS
27 in co-conspiracy with Williamsburg social services and defendant
28 Britany Moore. under these deprivation of rights and lack of due
process; plaintiff died and defendants basically KIDNAPPED
plaintiff and forced death upon Plaintiff. The (Al-Jarboua's are
NOT family members. The Cubans and Arabs are NOT family members,
they pretended to be plaintiff "wife" (x-wife, plaintiff WASN'T
married) and plaintiff son in Colorado (plaintiff son in Colorado
wasn't in Virginia)). Jeremy McCallup was a married man and
caused Jerry Theodore McCallup Jr williamsbug house to go into
forclosure by deception. (the bills were paid, everything was
taken care of,...) Plaintiff Jerry Theodore McCallup Jr had a
monthly income of \$3,400.00-\$4,900.00 and had 20 years of equity
in the house. Theres no reason to lose the home except Defendant
Jeremy McCallup , Fahad Al-jarboua and Deborah Al-jarboua scheme.
Defendant Jeremy McCallup was 20- 22 years old and had gotten
married and wanted the house.

1 11. Defendants were discriminating against Plaintiff and forcing
 2 death upon plaintiff; because of his race, creed, nationality and
 3 culture. On plaintiff birth certificate and death certificate it
 documents that plaintiff is a native American, an Indian.
 Plaintiff health could be treated with diet.

4 12. Plaintiffs recently learned that defendants used and allowed
 5 defendants Deborah Al- Jarboua, Fahad Al-Jarboua and Jeremy
 McCallup to pretend to be and to steal the identity of and
 6 aggravated identity theft, of: plaintiffs: 1. X-wife 2. plaintiff
 son; in order, to locate plaintiff money, insurance policies and
 7 property.

8 13. Plaintiff learned that defendants wanted the plaintiff Jerry
 Theodore McCallup Jr dead/to die; to collect his money, bank
 9 accounts, insurances, and property and to ensure death, they
 blocked tricked, would not contact, plaintiff Jerry Theodore
 10 McCallup Jr. sis, Dr. Veronica Renee McCallup DSc who is a
 medical doctor and who has been treating plaintiff holistically
 11 until plaintiff met the Cubans/arabs (al-jarboua's).

12 14. Hospital records and social service records and State records
 and court records DOCUMENT; that, defendant Deborah S. Al-Jarboua
 13 was in continual contact with defendants and that defendant
 Brittany moore and her supervisor "Evans" and the James city
 14 county Williamsburg and Envoy of Williamsburg used the 3
 defendants (Deborah Al-Jarboua, Fahad Al-Jarboua, Jeremy
 15 McCallup) recommendations to treat and medicate and kill
 16 plaintiff Jerry Theodore McCallup Jr.

17 15. Defendants Negligence caused another death during the same
 time frame, same location, same gender, same age group and under
 18 the same staff. This indicates that Defendant Scarlett Huag is in
 the morbid business and not compliance business. Two deaths with
 19 in a week of each other obviously indicate Envoy of Williamsburg
 is into murder.

20 16. All Defendants co-conspired to cause Plaintiffs death, even
 21 after plaintiff informed defendants he didn't take medications.

22 17. All Defendants Reckless and wanton conduct caused Plaintiffs
 wrongful death. All plaintiff's medical conditions could be
 23 treated with diet. Patients with Identical conditions are treated
 with diet ALL OVER THE WORLD.

24 18. Defendants of the Adult Protective Services division, abused
 power and co-conspired to cause plaintiff death with (the
 25 Cubans/Arabs Al-Jarboau's who are unauthorized persons violating
 HIPPA LAWS.

26 18. This wrongful death complaint cause of action, civil complaint
 27 has caused a. sorrow, b. mental anguish, c. loss of companionship
 and d. business partnership.

28 19. Plaintiff seeks Compensation for reasonably expected loss
 income from loss of business provided by the decedent.

20. Plaintiff seeks Expenses for the care and treatment and hospitalization of the decedent resulting in death and return of all expenses paid for unauthorized treatments and hospitalization.

21. Plaintiff seeks Funeral expenses and burial expenses because the cremation is in a bottle on the table.

10. Plaintiff seeks Punitive Damages

11. Plaintiff seeks compensatory damages

12. Dr. Veronica McCallup DSc is Plaintiff Administrator and Executor and is also Plaintiffs Beneficiary and Power of attorney and Medical Power of Attorney. However, was not ever contacted, called, emailed, found on facebook nor any other social media in violation of due process. And seek awards of all damages within this complaint.

13. The state last inspection on this facility was July 2018 and no further check ups were made. The state found serious violations at that time, that were not ever corrected. The county should have been aware of these violations and should never have placed the plaintiff there, nor should Jerry Theodore McCallup Jr. have been placed in any hospital. His Doctor sister could have taken him home or to a better care facility.

14. Nor should defendants send any person to these violating defendants for any care, hospice care or post care of any kind. The State should care about seniors and not conspire in senior abuse, elder abuse and violation to medicare medicade spending, medicade.

15. The Williamsburg Judge is included as a defendant because he knew all parties wasn't served/found/included. And the Judge defendant is the only Judge in town and when plaintiff attempted to file the wrongful death lawsuit in 2019, this Judge would return the documents without filing. Plaintiff went to Virginia and personally filed the lawsuit and the Judge refused to allow plaintiff to file the Lawsuit. Plaintiff a 3rd time filed the rejected lawsuit and the Judge refused to allow plaintiff to file the lawsuit and WOULDN'T tell plaintiff why after 3-4 times.

CLAIM XXXX Wrongful Death due to a preventable medical error and the reckless/negligent behavior of defendants. DEMAND

\$3,000,000.00 MILLION DOLLARS

2. Wrongful death and Patient Rights

1 3. Time after time after time the medical staff failed to properly
 2 obtain medical care out side of Virginia and give Plaintiff Jerry
 3 Theodore McCallup Jr, the best care.

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14 DSc who is a medical doctor and who has been treating
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35 Identical conditions are treated with diet ALL OVER THE
36 WORLD.
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38 abused power and co-conspired to cause plaintiff death with
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And the Judge defendant is the only Judge in town and when
plaintiff attempted to file the wrongful death lawsuit in
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Plaintiff went to Virginia and personally filed the lawsuit
and the Judge refused to allow plaintiff to file the
Lawsuit. Plaintiff a 3rd time filed the rejected lawsuit and
the Judge refused to allow plaintiff to file the lawsuit and
WOULDN'T tell plaintiff why after 3-4 times.
37. Wherefore, causing plaintiffs damages, grief, undue
stressors, emotional distress, fees, fines sabotaging
plaintiffs statue of limitations, obstructing Justice. And
plaintiff is entitled to damages demanded herein of
\$3,000,000.00 PLUS Punitive damages and the courts have held
that pro per litigants can receive attorney type fees for
litigations/working, just like in probate matters; the
administrator is paid for all hours worked on the
estate. Plaintiff Dr Veronica McCallup DSc is Plaintiff's

Jerry Theodore McCallup JR Beneficiary and Power of attorney and medical Power of Attorney documented with the military and other courts in other states including Virginia. No court, no hospital, NO action concerning Plaintiff Jerry Theodore McCallup JR. can precede without Plaintiff Dr. Veronica McCallup DSc.

38.

IV. Relief 80.1 million dollars plus funeral expenses burial and travel

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or Punitive money damages. Plaintiff demands all property of Jerry Theodore McCallup JR cars homes land bank accounts credit unions and all stated and alluded to herein.

Respectfully submitted

Dr. Veronica McCallup DSc

Plaintiff In Propria persona

I declare under Penalty of Perjury That ALL herein this COMPLAINT is to best of my ability and true and correct, this the September 7st, 2020

Sincerely,

Dr. Veronica McCallup DSc
Plaintiff In Pro per

Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will

likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: September 7, 2020

Signature of Plaintiff

Printed Name of Plaintiff: Dr. Veronica McCallup DSc

For Attorneys

Date of signing: September 7, 20120

Signature of Attorney:

Printed Name of Attorney: Dr. Veronica McCallup DSc

Bar Number: Pro Pro

Name of Law Firm: Estate of Jerry Theodore McCallup Jr

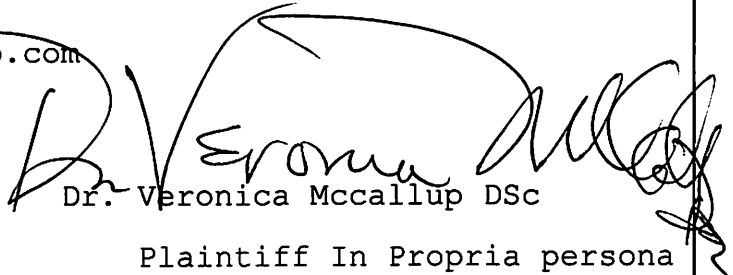
Street Address: 1042 N. Mountain Ave

State and Zip Code: California 91786

Telephone Number: 504-405-6513

E-mail Address: vmccallup@yahoo.com

Respectfully submitted


Dr. Veronica McCallup DSc

Plaintiff In Propria persona

CERTIFICATE OF SERVICE

I, Dr. Veronica McCallup DSc have served all parties at last known addresses and electronically where possible. All

Governments waive service. Done this the September 7th 2020

I declare under penalty of perjury this is true and correct.

Sincerely,

Dr. veronica McCallup DSc

Plaintiff In Propria Persona